

## Appendix F

### AIR QUALITY TECHNICAL ASSESSMENT

The definition of acronyms used in this Appendix are:

AAQS	Ambient Air Quality Standards
APCD	Air Quality Control Division
AP-42	EPA's compilation of emission factors
AQRV	Air Quality Related Values
BART	Best Available Retrofit Technology
BTEX	Benzene, toluene, ethylbenzene, and xylenes
CAAQS	Colorado Ambient Air Quality Standards
CAFO	Concentrated animal feeding operation
CAMx	Comprehensive Air Quality Model with Extensions
CH <sub>4</sub>	Methane
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CO <sub>2</sub> e	Carbon dioxide equivalent
km	Kilometer
µg/m <sup>3</sup>	Micrograms per cubic meter
MMscf	Million standard cubic feet
mtpy	Metric tons per year
N	Nitrogen
N <sub>2</sub> O	Nitrous oxide
NO <sub>2</sub>	Nitrogen dioxide
NO <sub>x</sub>	Oxides of nitrogen
NAAQS	National Ambient Air Quality Standards
PM	Particulate matter
PM <sub>2.5</sub>	Particulate matter less than or equal to 2.5 microns in diameter
PM <sub>10</sub>	Particulate matter with aerodynamic diameter of 10 microns or less
ppb	Parts per billion
ppm	Parts per million
PSD	Prevention of Significant Deterioration
S	Sulfur
SO <sub>2</sub>	Sulfur dioxide
tpy	Tons per year (short)

## 1.0 INTRODUCTION

This air quality appendix provides an outline of the techniques that were employed in the environmental analysis process, and planning process, for the Kremmling Field Office (KFO) Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS). The DRMP/DEIS addresses future land and resource management options, and the potential environmental impacts that may result from each of those options, for approximately 378,884 surface acres and approximately 2,240,775 subsurface acres of mineral estate administered by the KFO in Eagle, Grand, Jackson, Larimer, and Summit Counties, Colorado. Public lands administered by the KFO extend east to the Continental Divide, west to Steamboat Springs and Vail, south to Interstate-70, and north to the Wyoming border. This combined acreage (surface acres and subsurface mineral estate) is being analyzed as the "Planning Area" for the purposes of this DRMP/DEIS. Approximately 80 percent of the Federal mineral estate lands are available for oil and gas leasing. Currently, less than 10 percent of the lands available for leasing are under oil and gas leases.

Within the Planning Area, approximately 675 wells having been drilled since the early 1920s. (Averaged over the past 90 years, this is approximately 7 to 8 wells per year.) After internal and external scoping was conducted during the planning process, it was determined that a qualitative assessment for air resource impacts is appropriate for most management activities proposed in this DRMP/DEIS. However, with regard to oil and gas activities and livestock grazing, a quantitative Emissions Inventory was developed in order to analyze the potential emissions associated with those activities. Due to the relatively low level of fluid minerals development, and to the highly speculative nature of currently available data (including the lack of well location data), the BLM determined that a hypothetical Air Quality Modeling Assessment for this DRMP/DEIS would not provide useful, or accurate, predictive information for the public or for the decision-maker. When adequate data becomes available (such as during the project application stage), it may become necessary to require air quality modeling in order to assess the potential impacts during the environmental analysis process [in accordance with the National Environmental Policy Act (NEPA)] for future activities prior to authorization by the BLM.

Historically, there has been relatively little oil or gas development within the Planning Area; therefore, the underground geology of the area is not well understood. If, and/or when, exploration wells are drilled, more information will be known about the location, quality, and characteristics of the resources. The KFO does have a Reasonably Foreseeable Development (RFD) Scenario for a potential of up to 370 oil and gas wells (192 wells on Federal lands and 178 wells on fee lands) to be drilled over the next 20 years (BLM 2008r). Therefore, the BLM determined that the preparation of an Emission Inventory would be the most appropriate assessment for air quality at this time. Detailed information is either unknown, or too speculative, to conduct a quantitative air quality impacts analysis (a Modeling Analysis). If, and/or when, activities are proposed for implementation under the Approved RMP (Approved Plan), and if air quality is determined to be an issue of concern during the environmental analysis process, then a more detailed air quality analysis would be conducted (including, potentially, a more detailed Emissions Inventory or a Modeling Assessment).

## 2.0 AIR AQUALITY MANAGEMENT FRAMEWORK

The basic framework for controlling air pollutants in the United States is mandated by the Clean Air Act (CAA), and its amendments, and by State air quality management programs. Federal and State air quality management programs have evolved using two distinct management approaches:

- **State Implementation Plan** -- The first type of management approach is the State Implementation Plan (SIP) process of setting ambient air quality standards for acceptable exposure to air pollutants; conducting monitoring programs in order to identify locations experiencing air quality problems; and developing programs and regulations designed to reduce, or eliminate, those problems.
- **Hazardous Air Pollutants** -- The second type of management approach involves the Hazardous Air Pollutant (HAP) regulatory process, which identifies specific chemical substances that are potentially hazardous to human health, and then sets emission standards in order to regulate the amount of those substances that can be released by individual commercial or industrial facilities, or by specific types of equipment.

Typically, air quality programs based upon ambient air quality standards address air pollutants that are produced in large quantities by widespread types of emission sources, and that are of public health concern. In addition to pollutants for which there are adopted ambient standards, the SIP planning process is also used in order to address regional haze visibility issues. Currently, the industry-specific emission regulation approach is used in order to address air quality concerns of hazardous air pollutants and some ozone-depleting chemicals.

For the BLM, air quality and climate are the principle components of the BLM Air Resource Management Program. The program focuses on management of air resources, as well as on how they affect, and are affected by, other resource values and uses of the public lands.

Air quality is determined by the composition (chemical and physical) and concentration of atmospheric pollutants, meteorology, and terrain; it also includes noise considerations, smoke management, and visibility. Currently, the CAA identifies 6 nationally regulated air pollutants (called criteria pollutants) and 187 hazardous air pollutants, subject to change over time. (For more information, visit: <http://www.epa.gov/ttn/atw/pollsour.html>.) Activities, programs, and projects initiated by the BLM, as well as activities and projects initiated by external proponents, have the potential to impact air quality via emissions of these pollutants. The BLM, therefore, analyzes the potential impacts of all Proposed Actions on air quality as part of its planning, environmental analysis, and decision-making processes.

Climate represents the long-term statistics of daily, seasonal, and annual weather conditions. Climate is the composite of generally prevailing weather conditions of a particular region throughout the year, averaged over a series of years (typically, 30 years). Climate is both a driving force and a limiting factor for biological, ecological, and hydrologic processes, as well as for resource management activities (such as disturbed-site reclamation, wildland fire management, drought management, rangeland and watershed management, and wildlife habitat administration).

The BLM is responsible for ensuring that the activities, programs, and projects it undertakes or authorizes comply with all applicable laws, rules, regulations, policies, standards, and

guidelines; including establishing conditions of approval (COAs) and stipulations in leases and permits. Under the Federal Land Policy and Management Act (FLPMA), the BLM is responsible for developing RMPs that provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans; and to manage the public lands in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values. In addition, RMPs may also establish management goals and objectives for BLM-managed public lands, and their associated resources, which require managing activities in a manner designed to attain, or maintain, a higher standard of air quality than that required by the CAA.

### Criteria Pollutants

The U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for 6 different pollutants, called criteria pollutants. Criteria pollutants include carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>), and lead (Pb). Federal ambient air quality standards are primarily based upon evidence of acute and chronic health effects. (Federal ambient air quality standards apply to outdoor locations to which the general public has access). The criteria pollutants are:

- **Carbon Monoxide** -- Carbon monoxide is a colorless, odorless gas formed during incomplete combustion of organic compounds. The major sources of carbon monoxide are combustion processes, such as fuel combustion in motor vehicles and industrial processes, agricultural burning, prescribed burning, and wildfires. Carbon monoxide is a public health concern because it combines readily with hemoglobin in the blood, and, as a result, reduces the amount of oxygen transported to body tissues. Relatively low concentrations of carbon monoxide can significantly affect the amount of oxygen in the blood stream because carbon monoxide binds to hemoglobin 200 times to 250 times more strongly than does oxygen. The cardiovascular system and the central nervous system can be affected when 2.5 percent to 4.0 percent of the hemoglobin in the blood is bound to carbon monoxide rather than to oxygen. Usually, due to its low chemical reactivity and low solubility, indoor carbon monoxide levels are similar to outdoor levels.
- **Nitrogen Dioxide** -- Nitrogen dioxide is a brownish red gas formed as an indirect product of combustion processes. Some nitrogen dioxide can be formed from nitrogen compounds contained in the combusted fuel; however, most is produced by high-temperature oxidation of nitrogen gas in the air. The dominant oxide of nitrogen produced during combustion is nitric oxide. Nitric oxide is converted fairly quickly into nitrogen dioxide by chemical reactions with atmospheric oxygen and ozone. Nitrogen dioxide is a respiratory and eye irritant, as well as a plant toxin. Nitrogen dioxide is also a precursor of photochemically generated ozone, nitric acid, and nitrate aerosols.
- **Sulfur Dioxide** -- Sulfur dioxide is a colorless, but pungent, gas formed primarily by combustion of sulfur-containing compounds. Sulfur dioxide is a respiratory irritant, and undergoes chemical reactions that can form sulfuric acid and various sulfate aerosols.
- **Ozone** -- Ozone is not released directly into the atmosphere. It forms as the result of complex chemical reactions that occur in sunlight. The chemical reactions that produce ozone involve a wide range of volatile organic compounds (VOCs) and oxides of

nitrogen. VOCs and nitrogen oxides (the combination of nitric oxide and nitrogen dioxide) are the precursor emission products that form ozone. The atmospheric chemical reaction processes that produce ozone also produce chemically formed particulate matter and acidic compounds. Combustion processes, which produce nitrogen oxides, and evaporation of VOCs, are the major emission sources for organic compounds. Common combustion sources include fuel combustion in motor vehicles, fuel combustion in industrial processes, agricultural burning, prescribed burning, and wildfires. Common evaporative sources of organic compounds include paints, solvents, liquid fuels, or liquid chemicals. Ozone is a strong oxidizing agent that reacts with a wide range of materials and biological tissues. It is a respiratory irritant that can result in acute and chronic impacts to the respiratory system. Recognized impacts include reduced pulmonary function, pulmonary inflammation, increased airway reactivity, aggravation of existing respiratory diseases (such as asthma, bronchitis, and emphysema), physical damage to lung tissue, decreased exercise performance, and increased susceptibility to respiratory infections. In addition, ozone is a necrotic agent that significantly damages leaf tissues of crops and natural vegetation. Ozone also damages many materials by acting as a chemical oxidizing agent. Usually, due to its photochemical activity, indoor ozone levels are much lower than outdoor levels.

- **Particulate Matter** -- The major emission source categories for suspended particulate matter include: combustion sources (fuel combustion in motor vehicles and industrial processes, agricultural burning, prescribed burning, and wildfires); aerosols; industrial grinding and abrasion processes; soil disturbance by construction equipment, agricultural and forestry equipment, recreational vehicles, or other vehicles and equipment; mining and other mineral extraction activities; and wind erosion resulting from exposed soils and sediments. Suspended particulate matter is also formed by atmospheric chemical reactions.

Suspended particulate matter represents a diverse mixture of solid and liquid material having size, shape, and density characteristics that allow the material to remain suspended in the air for meaningful time periods. The physical and chemical composition of suspended particulate matter is highly variable, resulting in a wide range of public health concerns. Many components of suspended particulate matter are respiratory irritants. Some components (such as crystalline or fibrous minerals) are primarily physical irritants. Other components are chemical irritants (such as sulfates, nitrates, and various organic chemicals). Suspended particulate matter also can contain compounds (such as heavy metals and various organic compounds) that are systemic toxins or necrotic agents. Suspended particulate matter or compounds adsorbed on the surface of particles can also be carcinogenic or mutagenic chemicals. Public health concerns associated with suspended particulate matter focus on the particle size ranges likely to reach the lower respiratory tract or the lungs. Inhalable particulate matter (PM<sub>10</sub>) represents particle size categories that are likely to reach either the lower respiratory tract or the lungs after being inhaled. Fine particulate matter (PM<sub>2.5</sub>) represents particle size categories likely to penetrate to the lungs after being inhaled. (The “10” in PM<sub>10</sub> and the “2.5” in PM<sub>2.5</sub> are not upper size limits. The numbers refer to the particle size range collected with 50 percent mass efficiency by certified sampling devices; larger particles are collected with lower efficiencies, and smaller particles are collected with higher efficiencies.)

In addition to public health impacts, suspended particulate matter results in a variety of material damage and nuisance impacts, including abrasion; corrosion, pitting, and other chemical reactions on material surfaces; soiling; and transportation hazards (due to visibility impairment).

- **Lead** -- Lead is a toxic metal that can cause learning disabilities and damage to the kidneys and brain. Atmospheric lead compounds occur, primarily, as a component of suspended particulate matter. Since the phase-out of lead additives in most gasoline, the dominant source of lead in atmospheric particles in the United States has become industrial facilities (such as lead smelters) and dust from deteriorating lead-based paints.

### Colorado and National Ambient Air Quality Standards

Colorado has adopted State ambient air quality standards that are, generally, equal to current or former Federal standards. Colorado has adopted a 3-hour sulfur dioxide standard that is more stringent than the comparable Federal standard. Table F-2.1, Colorado and National Ambient Air Quality Standards, summarizes current Federal and Colorado ambient air quality standards. {NOTE: Since this table was created, the EPA has promulgated some additional standards: an additional 1-hour standard for NO<sub>2</sub>, which is 189 ug/m<sup>3</sup>; an additional 1-hour standard for SO<sub>2</sub>, which is 196 ug/m<sup>3</sup>.}

Air pollutants covered by State and Federal ambient air quality standards can be categorized by the nature of their toxic effects, such as:

- irritants (such as ozone, particulate matter, nitrogen dioxide, sulfur dioxide, sulfate particles, and hydrogen sulfide) that affect the respiratory system, eyes, mucous membranes, and the skin;
- asphyxiants (such as carbon monoxide and nitric oxide) that displace oxygen or interfere with oxygen transfer in the circulatory system, thereby affecting the cardiovascular and central nervous system;
- necrotic agents (such as ozone, nitrogen dioxide, and sulfur dioxide) that directly cause cell death; or

systemic poisons (such as lead particles) that affect a range of tissues, organs, and metabolic processes.

**Table F-2.1 National Ambient Air Quality Standards (NAAQS), Colorado Ambient Air Quality Standards (CAAQS), and PSD Significant Monitoring Concentrations**

Criteria Pollutant	Avg. Period	Primary Standard ( $\mu\text{g}/\text{m}^3$ [ppm/ppb])	Secondary Standard	Additional Standards	PSD Significant Monitoring Concentration
		NAAQS	NAAQS	CAAQS	
CO	1-hour	40,000 [35ppm]	None	NA	NA
CO	8-hour	10,000 [9ppm]	None	NA	575 $\mu\text{g}/\text{m}^3$
NO <sub>2</sub>	1-hour	189 [100ppb]	NA	NA	NA
NO <sub>2</sub>	Annual	100 [53ppb]	100 [53ppb]	NA	14 $\mu\text{g}/\text{m}^3$
PM <sub>10</sub>	24-hour	150	150	NA	10 $\mu\text{g}/\text{m}^3$
PM <sub>2.5</sub>	24-hour	35	35	NA	4 $\mu\text{g}/\text{m}^3$
PM <sub>2.5</sub>	Annual	15	15	NA	NA
SO <sub>2</sub> <sup>a</sup>	1-hour	196 [75ppb]	N/A	NA	NA
SO <sub>2</sub> <sup>f</sup>	3-hour	NA	1300 [.5ppm]	700 $\mu\text{g}/\text{m}^3$	NA
SO <sub>2</sub> <sup>g</sup>	24-hour	NA	NA	NA	13 $\mu\text{g}/\text{m}^3$
SO <sub>2</sub> <sup>h</sup>	Annual	80 [0.030]	NA	NA	NA
Ozone	8-hour	.075 ppm	.075 ppm	NA	100 tpy VOCs or Nox



Lead	rolling 3-month	.15 ug/m3	.15 ug/m3	NA	NA
Lead	3-month	NA	NA	NA	.1 ug/m3
Fluorides	24-hour	NA	NA	NA	.25 ug/m3
Total Reduced Sulfur	1-hour	NA	NA	NA	.2 ug/m3
Reduced Sulfur Compounds	1-hour	NA	NA	Na	10 UG/M3
<p><b>**The significant monitoring concentrations (de minimis levels) apply only to new sources and modifications subject to PSD review (see Regulation No. 3, Part D, section VI.)</b></p>					

CAAQS = Colorado Ambient Air Quality Standards

µg/m<sup>3</sup> = micrograms per cubic meter

N/A = not applicable

NAAQS = National Ambient Air Quality Standards

<sup>a</sup> For short-term (non-annual) averaging times, compliance with the CO, PM<sub>10</sub>, and SO<sub>2</sub> NAAQS is based on the highest-second-highest (H2H) short-term concentration, while compliance with the short-term PM<sub>2.5</sub> and NO<sub>2</sub> NAAQS is based on the highest 3-year average eighth-highest short-term concentration. Short-term modeled concentrations reported here are highest-second-highest for CO, PM<sub>10</sub>, and SO<sub>2</sub>, and highest-eighth-highest for PM<sub>2.5</sub> and NO<sub>2</sub>. Annual (long-term) modeled concentrations are highest concentrations which are required for an annual average NAAQS compliance demonstration.

<sup>b</sup> The 1-hour NO<sub>2</sub> background concentration was not added to the modeled concentration. February 22, 2010 USEPA guidance describes identification of the 3-year average of the eighth-highest modeled concentration on a receptor-by-receptor basis (USEPA 2010c). Inclusion of background concentration is not included in the procedure for comparing AERMOD modeling results with the 1-hour NO<sub>2</sub> NAAQS.

<sup>c</sup> PM<sub>2.5</sub> and PM<sub>10</sub> modeling results are shown for Alternatives B, C, and D fugitive dust emission rates (which are identical) and for Alternative A non-fugitive dust emission rates.

<sup>d</sup> Due to 1-hour NO<sub>2</sub>, 24-hour PM<sub>2.5</sub>, and 1-hour SO<sub>2</sub> NAAQS standard formats that use a three-year average to determine compliance, only one total concentration is reported for the three-year modeling period.

<sup>e</sup> The new 1-hour SO<sub>2</sub> standard became effective on August 23, 2010. To comply with the 1-hour SO<sub>2</sub> standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentration must be less than or equal to 195.5 µg/m<sup>3</sup> (75 ppb).

<sup>f</sup> As of August 23, 2010, this standard transitioned from a primary standard (protecting human health) to a secondary standard (protecting environment) at the federal level. However, state air quality agencies have discretion to continue enforcing this standard as a primary standard. The 3-hour standard will become obsolete at the federal level once attainment/nonattainment designations under the new 1-hour SO<sub>2</sub> standard are promulgated by USEPA.

<sup>g</sup> The 24-hour and annual standard will become obsolete at the federal level once attainment/nonattainment designations under the new 1-hour SO<sub>2</sub> standard are promulgated by USEPA.



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## **Hazardous Air Pollutants**

Typically, air quality programs based upon the regulation of other hazardous substances address chemicals used, or produced, by limited categories of industrial facilities. Programs regulating hazardous air pollutants focus on substances that alter or damage the genes and chromosomes in cells (mutagens); substances that affect cells in ways that can lead to uncontrolled cancerous cell growth (carcinogens); substances that can cause birth defects or other developmental abnormalities (teratogens); substances with serious acute toxicity effects; and substances that undergo radioactive decay processes (resulting in the release of ionizing radiation). Federal air quality management programs for hazardous air pollutants focus on setting emission limits for particular industrial processes rather than on setting ambient exposure standards. Federal emission standards for hazardous air pollutants have been promulgated as National Emission Standards for Hazardous Air Pollutants (NESHAP) and as Maximum Achievable Control Technology (MACT) standards. The Federal MACT standard for mercury emissions from coal-fired power plants represents an example of such hazardous air pollutant control programs. The NESHAP and MACT standards are implemented through State and Federal air quality permit programs. Colorado Air Pollution Control Division (APCD) Regulation 8 adopts Federal NESHAP and MACT standards by reference, and includes additional requirements for the State asbestos control program.

## **Visibility Impairment**

The EPA, the BLM, the US Forest Service (USFS), the National Park Service (NPS), the U.S. Fish and Wildlife Service (USFWS), and regional associations of State Air Quality Management Agencies operate the Inter-agency Monitoring of Protected Environments (IMPROVE) program. The IMPROVE program monitors visibility conditions and particulate matter concentrations in, or near, Class I Areas across the country. Some of the IMPROVE sites also document visibility conditions with remotely operated cameras. There are 6 IMPROVE monitoring locations in Colorado; 3 of which are in, or near, the Planning Area. The NPS operates 1 Monitoring Station on the east side of Rocky Mountain National Park. The USFS operates 1 Monitoring Station at Buffalo Pass (south end of the Mount Zirkel Wilderness), and 1 Monitoring Station at the Aspen Mountain Ski Area (east of the Maroon Bells-Snowmass Wilderness).

## **Atmospheric Deposition Constituents**

Two (2) separate Air Quality Monitoring Programs are being used to monitor atmospheric deposition of various compounds. The Programs originated as acid deposition monitoring programs; however, they have expanded to include monitoring of other compounds. The EPA Clean Air Status and Trends Network (CASTNET) operates as a dry deposition monitoring program. There are 3 CASTNET monitoring sites in Colorado: Rocky Mountain National Park, Gothic, and Mesa Verde National Park. The CASTNET monitoring site in Rocky Mountain National Park is not co-located with the IMPROVE site at Rocky Mountain National Park. The National Atmospheric Deposition Program/National Trends Network (NADP/NTN) Program provides wet deposition monitoring focused on acid deposition issues. In 1996, a mercury deposition monitoring program was integrated into the NADP/NTN Program; however, it does not operate at all NADP/NTN sites. Nationally, there are more than 250 sites in the NADP/NTN network, with 19 sites in Colorado. Some of the NADP/NTN sites are either co-located, or located near, CASTNET or IMPROVE monitoring sites.

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## Greenhouse Gases

Greenhouse gases (GHGs) are compounds in the atmosphere that absorb infrared radiation and re-radiate a portion of that back toward the Earth's surface, thereby trapping heat and warming the Earth's atmosphere. The most important naturally occurring GHG compounds are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone (O<sub>3</sub>), and water vapor (H<sub>2</sub>O). Carbon dioxide, methane, and nitrous oxide are produced naturally by respiration and other physiological processes of plants, animals, and microorganisms; by the decomposition of organic matter; by volcanic and geothermal activity; by naturally occurring wildfires; and by natural chemical reactions in soil and water. Ozone is not released directly by natural sources. It forms during complex chemical reactions in the atmosphere among organic compounds and nitrogen oxides in the presence of ultraviolet radiation. Water vapor is a strong GHG; however, its concentration in the atmosphere is, primarily, a result of (not a cause of) changes in surface and lower atmospheric temperature conditions.

Although naturally present in the atmosphere, concentrations of carbon dioxide, methane, and nitrous oxide are also affected by emissions from industrial processes, transportation technology, urban development, agricultural practices, and other human activity. The Intergovernmental Panel on Climate Change (IPCC) estimates the following changes in global atmospheric concentrations of the most important GHGs (IPCC 2001, 2007):

- atmospheric concentrations of carbon dioxide have risen from a pre-industrial background of 280 parts per million by volume (ppm) to 379 ppm in 2005;
- atmospheric concentrations of methane have risen from a pre-industrial background of about 0.70 ppm to 1.774 ppm in 2005; and
- atmospheric concentrations of nitrous oxide have risen from a pre-industrial background of .270 ppm to 0.319 ppm in 2005.

The IPCC has concluded that these changes in atmospheric composition are almost entirely the result of human activity, not the result of changes in natural processes that produce or remove these gases (IPCC 2007).

Carbon dioxide, methane, and nitrous oxide have atmospheric residence times ranging from about a decade to more than a century. Several other important GHG compounds with long atmospheric residence times are produced almost entirely by various industrial processes; these include sulfur hexafluoride (SF<sub>6</sub>), and a wide range of fluorinated hydrocarbons (HFCs). Typically, fluorinated compounds have atmospheric residence times ranging from a few decades to thousands of years. Typically, the overall global warming potential of GHG emissions is presented in terms of carbon dioxide equivalents (CO<sub>2</sub>e), using equivalency factors developed by the IPCC. The IPCC has published sets of CO<sub>2</sub>e factors as part of its periodic climate change assessment reports issued in 1995, 2001, and 2007.

Of these pollutants, carbon dioxide, methane, and nitrous oxide are commonly emitted by oil and gas sources, while the remaining 3 GHGs are emitted in extremely small quantities or are not emitted at all. As the major component of natural gas, CH<sub>4</sub> emissions resulting from oil and gas exploration, production, and transportation are considerable.

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Aggregate GHG emissions are discussed in terms of carbon dioxide equivalent (CO<sub>2</sub>e). Each GHG has a global warming potential (GWP). As defined by the EPA, the GWP provides a “ratio of the time-integrated radiative forcing from the instantaneous release of one kilogram of a trace substance relative to that of one kilogram of CO<sub>2</sub>” (GPO 2010). In other words, the GWP accounts for the intensity of each GHG’s heat trapping effect and its longevity in the atmosphere. The GWP provides a method to quantify the cumulative impact of multiple GHGs released into the atmosphere by calculating CO<sub>2</sub>e for the GHGs. The EPA’s GWPs are provided in **Error! Reference source not found.** F-2.2, and were determined on a 100-year basis. [These GWPs are set forth in EPA regulations within Title 40 of the Code of Federal Regulations (CFR) Part 98.]

<b>Table F-2.2</b> <b>GHGs Reported to EPA and Global Warming Potentials</b>		
<b>Air Pollutant</b>	<b>Chemical Symbol or Acronym</b>	<b>Global Warming Potential</b>
Carbon dioxide	CO <sub>2</sub>	1
Methane	CH <sub>4</sub>	21
Nitrous oxide	N <sub>2</sub> O	298
Hydrofluorocarbons	HFCs	Varies
Perfluorocarbons	PFCs	Varies
Sulfur hexafluoride	SF <sub>6</sub>	23,900

Sources: GPO 2009; GPO 2010, Table A-1.

To date, the EPA has not mandated stationary source GHG emission reductions or set NAAQS for these pollutants. However, the EPA does require certain GHG emission sources, and some GHG suppliers, to report GHG emissions. Beginning in 2011, large stationary sources of GHGs will be required to obtain Air Quality Permits from local, State, or Federal air quality agencies (GPO 2010f).

The EPA estimates that national GHG emissions in 2006 were 6,801,812,000 tons CO<sub>2</sub>e (EPA 2008). National GHG emissions in 2006 represented a 14 percent increase from estimated 1990 national GHG emissions (5,964,166,000 tons CO<sub>2</sub>e). The EPA categorized the major economic sectors contributing to U.S. emissions of GHG compounds as:

- electric power generation (34.5 percent);
- transportation (28.6 percent);
- industrial processes (19.9 percent);
- agriculture (7.7 percent);
- commercial land uses (5.7 percent); and
- residential land uses (3.6 percent).

## Air Quality Permit Programs

The CAA establishes a basic Air Quality Permit Program for industrial emission sources. Key elements of the Federal requirements include pre-construction permits [new source review and prevention of significant deterioration (PSD)] and annual Operating Permits (Title V). Separate reconstruction requirements have been established for non-attainment pollutants and for attainment pollutants. The Federal New Source Review (NSR) Program applies in non-

attainment areas to the applicable non-attainment pollutants. A key element of the NSR Program is a requirement to implement emission offsets so that a new source of emissions will not result in a net increase in non-attainment pollutant emissions for the non-attainment area. The Federal PSD Program applies to attainment pollutants. Key elements of the PSD Program include potential requirements for pre-construction and post-construction ambient air quality monitoring; the establishment of baseline ambient air quality levels maximum cumulative pollutant increments allowed above those baseline levels; the evaluation of proposed emission sources in order to determine their consumption of available PSD pollutant increments; and the evaluation of visibility impacts in designated Class I Wilderness Areas, National Parks, and National Monuments. (The Federal operating permit program is referred to as the Title V Permit Program, which establishes reporting and record-keeping requirements designed to ensure that conditions imposed by pre-construction permits are being met.)

In general, States have assumed primary responsibility for enforcing most Federal permit requirements, with the EPA exercising a formal review and oversight responsibility. Some States, including Colorado, have separate air permit programs authorized by State legislation. Typically, State air permit requirements cover emission sources that are smaller than those subject to Federal permit requirements. In most cases, including Colorado, State air permit programs have been integrated with Federal NSR, PSD, and Title V requirements in order to provide a consolidated permit program. Under consolidated permit programs, basic State permit requirements apply to all sources that are not specifically exempted. Additional NSR and PSD program requirements (including EPA review of the permit) become applicable if sources exceed various size or emission thresholds. (The owners and operators of emission sources are the parties responsible for obtaining required air permits.)

The Colorado Air Pollution Control Commission (APCD) administers State and Federal air permit programs in Colorado through the Colorado Air Pollution Control Division (APCD) of the Colorado Department of Public Health and Safety (CDPHE). In addition to permit programs for stationary emission sources, the Colorado APCD administers a State permit program that regulates open burning and prescribed fires. Colorado APCD Regulation 9 establishes separate permit programs for open burning and prescribed fires. The Colorado APCD administers the prescribed fire permit program throughout the State and administers the Open Burn Permit Program in most Counties. Administration of the Open Burn Permit Program has been delegated to some Counties (Boulder, Eagle, El Paso, Grand, Jefferson, Lake, Larimer, Los Animas, Mesa, Pueblo, Routt, Summit, and Weld). Prescribed fires smaller than de minimis thresholds set by Regulation 9 qualify for open burn permits.

State regulations define significant users of prescribed fire as local, State, or Federal agencies, or private landowners, that manage or own more than 10,000 acres of grassland and/or forest land in Colorado, and that plan to use prescribed fires, broadcast burns, or pile burns that are expected to generate more than 10 tons of PM<sub>10</sub> in a calendar year. Significant users of prescribed fire are required to submit Prescribed Fire Plans and obtain Prescribed Fire Permits. Prescribed Fire Plans submitted by significant users of prescribed fire can cover a period of up to 10 years, and are subject to public review and comment. The BLM, the USFS, the NPS, and the USFWS have all received approval for their Prescribed Fire Plans.

## Prevention of Significant Deterioration

The Federal CAA requires a planning program with the goal that all areas of the country achieve the Federal ambient air quality standards within various specified timeframes. For attainment areas that already meet the Federal ambient air quality standards, the Federal PSD Permit Program established a 3-tier classification defining the extent to which baseline air quality conditions can be degraded. Class I Areas have the smallest allowable air quality deterioration limits. Class II Areas allow greater deterioration of air quality; however, these areas must maintain air quality conditions better than the Federal air quality standards. Class III Areas allow deterioration of air quality to the level of the Federal ambient air quality standards. PSD program cumulative pollutant increments above baseline conditions have been established only for NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub>. The incremental increases allowed for specific pollutants in Class I and Class II Areas are summarized in Table F-2.3, PSD Increments.

<b>Table F-2.3 PSD Increments</b>			
Pollutant	Averaging Period	Class II PSD Increments	Class I PSD Increments
NO <sub>2</sub>	Annual <sup>2</sup>	25	2.5
PM <sub>10</sub>	24 <sup>1</sup>	30	8
	Annual	17	4
PM <sub>2.5</sub>	24	9	2
	Annual	4	1
SO <sub>2</sub>	3 <sup>1</sup>	512	25
	24 <sup>1</sup>	91	5
	Annual <sup>2</sup>	20	2

<sup>1</sup> No more than one exceedance per year.

<sup>2</sup> Annual arithmetic mean.

<sup>3</sup> Average of annual fourth-highest daily maximum 8-hour average.

<sup>4</sup> Category III Incremental standards (increase over established baseline).

## Regional Haze Regulations

The CAA requires the EPA to protect visibility conditions within the Class I Areas established under the PSD program, unless the responsible land management agency determines that visibility is not an important air quality value for a particular area. The CAA also requires the development of programs designed to remedy existing visibility impairment in Class I Areas if that visibility impairment results from human-made air pollution. The EPA has identified 2 general types of visibility impairment at Class I Areas: 1) impairment due to smoke, dust, colored gases, or layered haze attributable to a single stationary emission source or a small group of emission sources; and 2) impairment due to widespread, regionally homogeneous haze resulting from the cumulative emissions of varied emission sources in a region. The PSD permit program addresses visibility impairment from nearby stationary emission sources. Regional haze impacts resulting from cumulative emissions in a region are being addressed through new SIP planning requirements. Colorado submitted a SIP Amendment to the EPA in December of 2007 in order to address regional haze issues. One of the components of the

regional haze SIP is implementation of best available retrofit technology (BART) emission controls on certain categories of existing stationary emission sources (including power plants, cement kilns, and industrial boilers) that were built prior to 1977, if their emissions are reasonably expected to contribute to visibility degradation in Class I Areas. The CAA established an initial list of 158 Class I Areas comprised, primarily, of Wilderness Areas, National Parks, and National Monuments. Five (5) Native American tribal areas have subsequently been added to the list of Class I Areas. The remainder of the country is designated as Class II Areas. No areas have been designated as Class III Areas under the PSD Program. One element of the PSD Permit Program is a review of the extent to which a proposed emission source will impair visibility conditions in Class I Areas.

There are 12 PSD program Class I visibility protection areas in Colorado. Five (5) of Colorado's Class I Areas are in, or close to, the Planning Area. The Class I visibility protection areas in or close to the Planning Area include Rocky Mountain National Park, the Mount Zirkel Wilderness, the Rawah Wilderness, the Eaglesnest Wilderness, and the Flat Tops Wilderness.

### **Clean Air Act Conformity Requirements**

Section 176(c) of the CAA requires Federal agencies to ensure that actions undertaken in non-attainment or maintenance areas are consistent with the CAA, and with federally enforceable Air Quality Management Plans. The EPA has promulgated separate rules that establish conformity analysis procedures for highway/mass-transit projects (40 CFR Part 93, Subpart A) and for other (general) Federal agency actions (40 CFR Part 93, Subpart B). General conformity requirements are, potentially, applicable to many Federal agency actions; however, they apply only to those aspects of an action that involve ongoing Federal agency responsibility and control over direct or indirect sources of air pollutant emissions when those actions occur within non-attainment or maintenance areas.

The general conformity rule establishes a process that is intended to demonstrate that the proposed Federal action:

- would not cause, or contribute to, new violations of Federal air quality standards;
- would not increase the frequency or severity of existing violations of Federal air quality standards; and
- would not delay the timely attainment of Federal air quality standards.

The general conformity rule applies to Federal actions occurring in non-attainment or maintenance areas when the net change in total direct and indirect emissions of non-attainment pollutants (or their precursors) exceeds specified thresholds. The emission thresholds that trigger the requirements of the conformity rule are called de minimis levels. Emissions associated with stationary sources that are subject to permit programs incorporated into the SIP are not counted against the de minimis threshold. The CAA general conformity de minimis threshold for PM<sub>10</sub> maintenance areas is 100 tons of PM<sub>10</sub> emissions per year.

Compliance with the conformity rule can be demonstrated in several ways. Compliance is presumed if the net increase in direct and indirect emissions resulting from a Federal action would be less than the relevant de minimis level. If net emissions increases exceed the relevant



de minimis value, a formal conformity determination process must be followed. Federal agency actions subject to the general conformity rule cannot proceed until there is a demonstration of consistency with the SIP through one of the following mechanisms:

- by dispersion modeling analyses demonstrating that direct and indirect emissions resulting from the Federal action will not cause, or contribute to, violations of Federal ambient air quality standards;
- by showing that direct and indirect emissions resulting from the Federal action are specifically identified and accounted for in an approved SIP;
- by showing that direct and indirect emissions associated with the Federal agency action are accommodated within emission forecasts contained in an approved SIP;
- by showing that emissions associated with future conditions will not exceed emissions that would occur from a continuation of historical activity levels;
- by arranging emission offsets in order to fully compensate for the net emissions increase associated with the action;
- by obtaining a commitment from the relevant air quality management agency to amend the SIP in order to account for direct and indirect emissions resulting from the Federal agency action; or
- in the case of regional water or wastewater projects, by showing that any population growth accommodated by such projects is consistent with growth projections used in the applicable SIP.

Dispersion modeling analyses can be used to demonstrate conformity only in the case of primary pollutants such as carbon monoxide or directly emitted PM<sub>10</sub>. Modeling analyses cannot be used to demonstrate conformity for ozone because the available modeling techniques, generally, are not sensitive to site-specific emissions. No portions of the Planning Area have any Federal non-attainment or maintenance designations.

### **3.0 AMBIENT AIR QUALITY**

Existing air quality data for the Planning Area is summarized in Chapter 3, Affected Environment. The available data indicate that State and Federal ambient air quality standards for criteria pollutants are not exceeded at existing monitoring locations.

Based upon the BLM's request, the CDPHE provided background air quality data to be used in the Air Quality Assessment for this DRMP/DEIS (Chick 2008). Appropriate background concentrations were provided for areas close to Walden, Colorado (located just north of Kremmling) where a portion of the development potential exists. Table 4.3-1 lists the background concentrations provided by the CDPHE. Ambient background concentrations demonstrate that the entire Planning Area is in attainment for all applicable NAAQS.

**Table 4.3-1 Background Ambient Air Quality Concentrations**

Pollutant	Averaging Period	Measured Background Concentration	Basis for background concentration
PM <sub>10</sub>	24-hr (2 <sup>nd</sup> Max) Annual	23 µg/m <sup>3</sup> 11 µg/m <sup>3</sup>	Colowyo Axial, West Site, 1997 to 1998
SO <sub>2</sub>	3-hr (2 <sup>nd</sup> Max) 24-hr (2 <sup>nd</sup> Max) Annual	0.009 ppm (23.98 µg/m <sup>3</sup> ) 0.005 ppm (13.32 µg/m <sup>3</sup> ) 0.002 ppm (5.33 µg/m <sup>3</sup> )	Unocal, 1983 to 1984
NO <sub>2</sub>	Annual	0.005 ppm (3.83 µg/m <sup>3</sup> )	Rural default based on Encana Near Parachute Creek, 2007
CO	1-hr (2 <sup>nd</sup> Max) 8-hr (2 <sup>nd</sup> Max)	1 ppm (1,165 µg/m <sup>3</sup> ) 1 ppm (1,165 µg/m <sup>3</sup> )	Rural default based on American Soda, Piceance 2003 to 2004
PM <sub>2.5</sub>	98 <sup>th</sup> Percentile Annual	16 µg/m <sup>3</sup> 6 µg/m <sup>3</sup>	Rural default based on Chatfield State Park, 2006
Ozone	1-hr (2 <sup>nd</sup> Max) 8-hr (4 <sup>th</sup> Max)	0.058 ppm (116 µg/m <sup>3</sup> ) 0.053 ppm (106 µg/m <sup>3</sup> )	Golden Energy Florence, 2005 to 2006
Ozone	1-hr (2 <sup>nd</sup> Max) 8-hr (4 <sup>th</sup> Max)	0.088 ppm (176 µg/m <sup>3</sup> ) 0.075 ppm (150 µg/m <sup>3</sup> )	Rocky Mountain National Park, 2004 to 2006

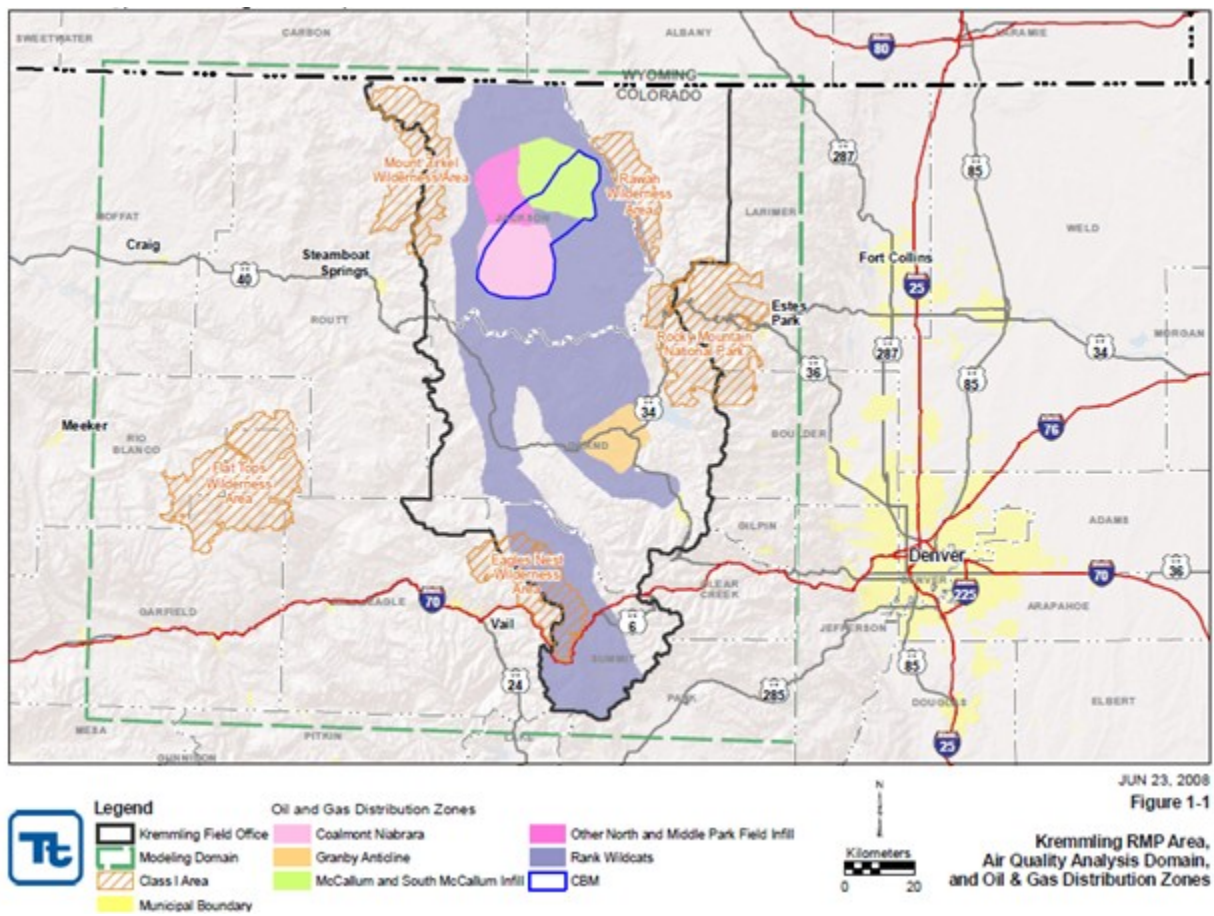
### Class I and Sensitive Class II Areas

Several PSD Class I Areas are located within, or close to, the Planning Area. These are the Eaglesnest, Flat Tops, Mount Zirkel, and Rawah Wilderness Areas and Rocky Mountain National Park. The Rawah Wilderness Area is located completely within the Planning Area, while Rocky Mountain National Park and the Eaglesnest and Mount Zirkel Wilderness Areas have a portion of the Class I PSD area located within the Planning Area. (Figure 4.3-2 illustrates the location of the Class I PSD areas relative to the Planning Area.) Table 4.3-2 lists the distance and location to the applicable Class I PSD areas. (The distances are approximated from the center of the Planning Area.

**Table 4.3-2 Distance and Direction to Class I Area**

Class I Area	Distance from Centerpoint (km)	Direction from Centerpoint	Distance to Centroid of Closest Oil and Gas Distribution Zone (km)
Mount Zirkel Wilderness Area	Adjacent	Northwest	17
Flat Tops Wilderness Area	100	Southwest	77
Rawah Wilderness Area	Inside Planning Area	Northeast	14
Rocky Mountain National Park	Adjacent	East	28
Eaglesnest Wilderness Area	Adjacent	Southwest	37

Figure 4.3-2 PSD Class I Areas



## 4.0 PROJECT EMISSIONS

An emissions inventory was developed for Alternative B, and include oxides of nitrogen (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), particulate matter less than or equal to 10 microns in size (PM<sub>10</sub>), particulate matter less than or equal to 2.5 microns in size (PM<sub>2.5</sub>), and volatile organic compounds (VOCs) for oil and gas production activities within the Planning Area. In addition, GHG emissions (including CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for oil and gas and CH<sub>4</sub> from enteric fermentation from livestock grazing) were calculated. Inventories were based upon emission factors from various sources including, but not limited to, manufacturer's data (where available), EPA AP-42, and Gas Research Institute (GRI) emission factors (EPA 1997). (Tetra Tech prepared an assumptions document and shared it with the KFO staff in order to ensure that activity assumptions and parameters used in the emissions calculations were appropriate.)

### Alternative A

Alternative A, the No Action Alternative, assesses the continuation of current management (assuming no change from current management direction). Emissions are based upon current oil and gas activity within the Planning Area, as well as the projections of the 1991 Colorado Oil and Gas Leasing and Development RMP Amendment/Environmental Impact Statement (EIS), which analyzed oil and gas development within the Planning Area (BLM 1991b).

The 1991 RMP Amendment analyzed the impacts of 108 wells (40 wildcat wells and 68 development wells). The RMP Amendment assumed 19 acres of disturbed area per well for a total disturbed area of 2,044 acres. Currently, there are 109 active wells within the Planning Area, which is 1 more well than the projected 108 wells (BLM 1991b). Seventy-seven (77) of the 109 wells are located on Federal lands. Most of the 109 wells are located in the McCallum fields. The current wells have a disturbed acreage of approximately 2 acres to 3 acres per well, as opposed to the projected 19 acres in the 1991 RMP Amendment. Alternative A will assume 1 well per pad, and a disturbed area of 3 acres per well. This scenario will assume the same well pad configuration as the RFD Scenario (BLM 2008r). Each well pad will include 1 separator, 2 water tanks, and 4 production tanks; electricity will be driven by a gas-fired generator.

### Alternative B

The RFD Scenario (BLM 2008r) forecasts the amount of drilling activity that could possibly occur in the 20 year period between 2009 and 2028 on Federal, State, and private lands within the Planning Area. The future anticipated drilling activity outlined in this RFD Scenario includes 370 oil and gas wells (192 wells on Federal lands and 178 wells on fee lands). It is assumed that the 370 wells will be drilled with vertical well bores over a 20 year period with the expected average life of a well to be 40 years.

Based upon the RFD Scenario, it is assumed that there is 1 well per well pad (BLM 2008r). The average disturbance per well is estimated to be 8 acres (4 acres for a drill pad, 2 acres for roads, and 2 acres for other infrastructure). The total potential anticipated surface disturbance at the end of the 20 year period is 4,310 acres. This is based upon an existing surface disturbance area of 1,350 acres and 2,960 new acres of disturbed land. The anticipated disturbance area is the gross acreage; the net acreage will be significantly lower due to the reclamation of plugged and abandoned wells. According to the RFD, the existing 1,350 acres of disturbed land (in 2008) accounts for the plugging and reclamation to date (BLM 2008r). Each well pad includes 1

separator, 4 production tanks, and 2 water tanks; electricity will be driven by a gas-fired generator. The year of peak overall emissions from oil and gas development activities is estimated to be 2028.

### Cumulative Analysis

Far-field cumulative impacts of oil and gas activities will be addressed in a qualitative manner; cumulative sources were not included in the Emissions Inventory. Air Quality modeling results from the DRMP/DEIS will be referenced in the cumulative impacts analysis (see Chapter 4, Environmental Consequences).

### Well Location Assumptions

Future potential oil and gas activity within the Planning Area is highly speculative, and little is known about the exact well locations for future development. Due to this uncertainty, modeling analysis to predict potential impacts to air quality was not considered a scientifically defensible analysis.

Assumptions about the type of field production (such as oil or gas) for Alternative B were based upon the RFD Scenario (BLM, 2008r). Well locations are speculative at this time; however, oil and gas 'Distribution Zones' were created in order to provide the public and the decision-maker with a visual guide of where current activity exists, and a 'best guess' of where potential future might occur. It should be noted, however, that the Alternative B Distribution Zone is just a best guess, without a high degree of certainty. As mentioned above, when adequate data becomes available (such as during the project application and environmental analysis stage), it may become necessary to require air quality modeling in order to assess the potential impacts resulting from future activities prior to authorization by the BLM.

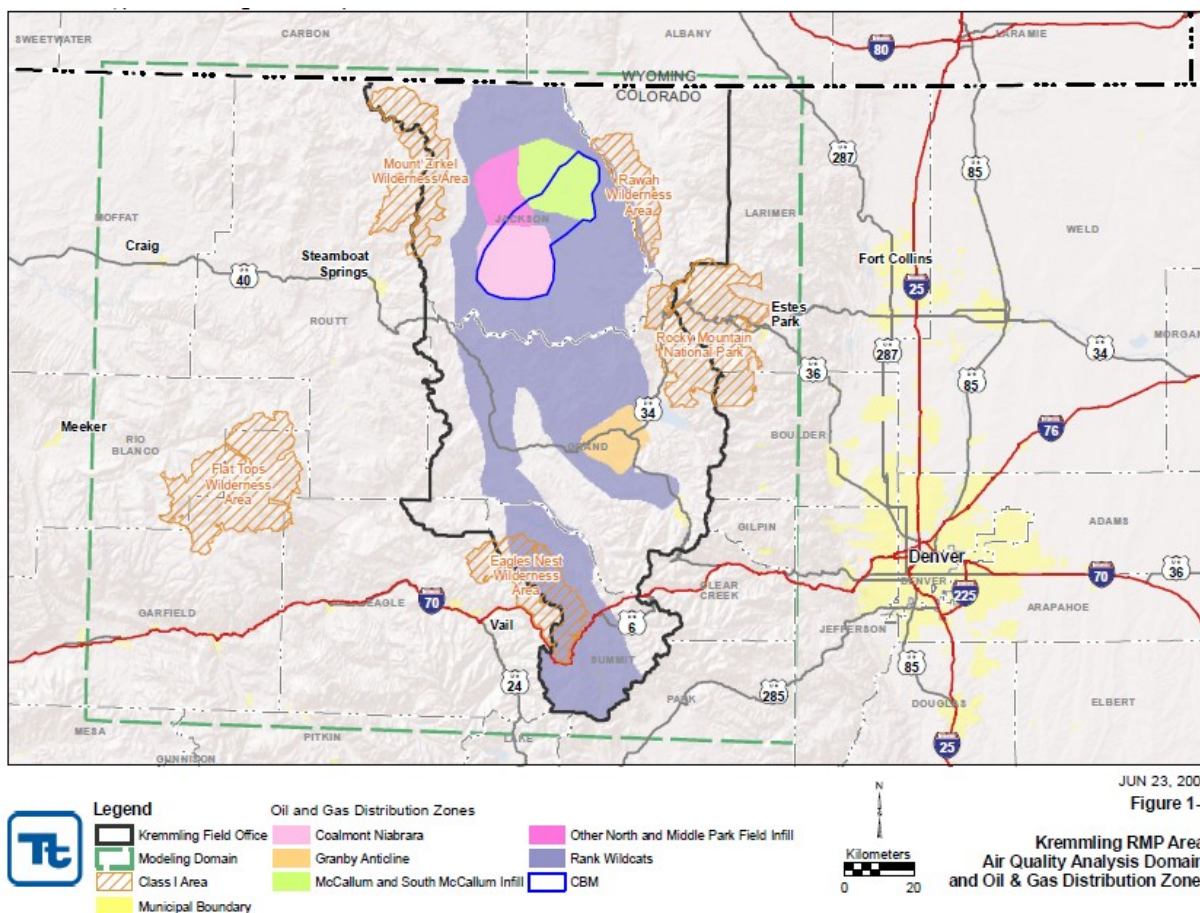
**Table 4.3-3 Current Activity (Alternative A)  
by Distribution Zone**

Field Name	Current Producing Wells
Coalmont Niobrara	7
CBM	0
Granby Anticline	0
McCallum and South McCallum Infill	84
Other North and Middle Park Field Infill	1
Rank Wildcats	17
<b>Total</b>	<b>109</b>



Table 4.3-4 Future Anticipated Activity by Distribution Zone (Alternative B)	
Field Name	Current Producing Wells
Coalmont Niobrara	234
CBM	40
Granby Anticline	16
McCallum and South McCallum Infill	40
Other North and Middle Park Field Infill	20
Rank Wildcats	20
<b>Total</b>	<b>370</b>

Figure 4.3-3 Distribution Zones for Potential Oil and Gas Development



## Construction Emissions

Construction emissions for both alternatives included well pad and resource road construction and traffic; rig move and drilling, and associated, traffic; completion and testing, and associated, traffic; and wind erosion during construction activities. Construction emissions for oil and natural gas wells were assumed to be identical.

## **Production Emissions**

Production emissions included combustion engine emissions and fugitive dust resulting from road travel to, and from, well sites; diesel combustion emissions from haul trucks; combustion emissions from well site heaters; condensate storage tank flashing and flashing control; wind erosion from well pad disturbed areas; and emissions from wellhead engines.

## **5.0 EMISSION CALCULATIONS**

Tables 5.1 through 5.24 provide a detailed analysis of the emission calculations that were performed for this DRMP/DEIS; and include the equations and assumptions that were used in order to prepare the Emissions Inventory. Tables 5.21 through 5.24 provide per-well totals for 2009, 2011, 2028; and the total emissions by year, respectively. Converting the files to the format of this document may have altered the resolution of the table; therefore, the tables may not be of optimal quality. A PDF copy of the following tables can be found online at: Alternatively, a copy can be requested from the Kremmling Field Office:

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Table 5.1 Pad Construction

Emission Source: WELL PAD CONSTRUCTION - GENERAL CONSTRUCTION ACTIVITY EMISSIONS

Emission Factor From: AP-42, Section 13.2.3 (EPA 1995)  
"Heavy Construction Operations"  
AP-42, Section 13.2.2 (EPA 1995)  
"Revision to fine fraction ratios"

TSP= 1.2 tons/acre/month

Emission Equation: Emissions (TPY) = EF (tons/acre/month) x Area (acre) x Equipment Time (hours)

Area per Well Pad (acre)	Equipment Time per Well Pad (hours)	Emission Control Efficiency	TSP Uncontrolled Emissions per Well Pad (lbs/year)	TSP Controlled Emissions per Well Pad (lbs/year)	PM <sub>10</sub> Conversion Factor <sup>1</sup>	PM <sub>2.5</sub> Conversion Factor <sup>1</sup>	Uncontrolled Emissions Per Well Pad (lb/yr)		Controlled Emissions Per Well Pad (lbs/yr)	
							PM10	PM2.5	PM10	PM2.5
8	70	50%	1841.10	920.55	0.25	0.15	460.27	69.04	230.14	34.52

Notes:

<sup>1</sup> PM<sub>10</sub> = 0.25\*TSP; PM<sub>2.5</sub> = 0.15\*PM<sub>10</sub>. Conversion factor from AP-42 13.2.2.

Construction activity includes all earthmoving and vehicle operation related to preparation of drill pad.

Table 5.2 Pad Construction Road Dust

Emission Source: WELL PAD CONSTRUCTION - VEHICLE ROAD DUST EMISSIONS

Emission Factor From: AP-42, Section 13.2.2 (EPA 2006)  
"Unpaved Roads - Industrial Roads"

Emission Factor Equation:  $E = k \times (s/12)^a \times (W/3)^b$

Where:  
E = Size-specific emission factor (lb/MT)  
s = Surface material silt content (%)  
W = Mean vehicle weight (tons)  
k = Empirical constant, particle size multiplier  
a = Empirical constant  
b = Empirical constant

Data:  
k = 1.5 for PM10  
k = 0.15 for PM2.5  
a = 0.9 for PM10 and PM2.5  
b = 0.45 for PM10 and PM2.5

Vehicle	Number of Round Trips per Day	Days on Location	Number of Vehicles	Total Number of Round Trips	Average Vehicle Weight (tons)	Silt Content <sup>1</sup> (%)	Vehicle Miles Travelled per Vehicle (VMT/vehicle)	Control Efficiency	PM10 Emission Factor (lb/VMT)	PM2.5 Emission Factor (lb/VMT)	Uncontrolled PM10 Emissions (lb/pad)	Controlled PM10 Emissions (lb/pad)	Uncontrolled PM2.5 Emissions (lb/pad)	Controlled PM2.5 Emissions (lb/pad)
low boy hauler	5	2	1	10	40	24	6	50%	8.98	0.90	538.76	269.38	53.88	26.94
gravel hauler	10	3	3	90	26	24	6	50%	7.40	0.74	3994.34	1997.17	399.43	199.72
water truck (road dust control)	6	3	1	18	26	24	6	50%	7.40	0.74	798.87	399.43	79.89	39.94
light duty vehicles (employee access)	1	7	2	14	4.6	24	6	50%	3.39	0.34	284.99	142.50	28.50	14.25
TOTAL											5616.96	2808.48	561.70	280.85

<sup>1</sup>Silt content from AP-42 Table 13.2.2-1 for a freshly graded haul road.

Table 5.3 Pad Construction Equipment Exhaust

Emission Source: WELL PAD CONSTRUCTION - HEAVY EQUIPMENT EXHAUST EMISSIONS

Emission Factor From: AP-42, Volume II - Mobile Sources (EPA 1985)  
"Emissions Factors for Construction Equipment"

Emission Equation: Emissions (TPY) = grams pollutant/year / 453.59 grams / 2000 lbs x Load Factor  
SO<sub>2</sub> Emissions (TPY) = grams SO<sub>2</sub>/year / 453.59 grams / 2000 lbs x Load Factor x Ultra Low Sulfur Adjustment

Emission Factors <sup>1</sup> (g/hp-hr)														
Equipment	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>2</sup>	SO <sub>2</sub>	VOC	CO <sub>2</sub> <sup>6</sup>	CH <sub>4</sub> <sup>7</sup>	N <sub>2</sub> O <sup>7</sup>	Form.	Benzene	Toluene	Xylene	
Dozer <sup>3</sup>	2.15	7.81	0.692	0.692	0.851	0.75	521.6	0.0252	0.0155	0.003747	0.002962	0.001299	0.000905	
Grader	2.45	7.46	0.789	0.789	0.901	0.55	521.6	0.0252	0.0155	0.003747	0.002962	0.001299	0.000905	
Motor Grader	2.45	7.46	0.789	0.789	0.901	0.55	521.6	0.0252	0.0155	0.003747	0.002962	0.001299	0.000905	
Backhoe	2.45	7.46	0.789	0.789	0.901	0.55	521.6	0.0252	0.0155	0.003747	0.002962	0.001299	0.000905	

Equipment	Engine Horsepower (hp)	Operating Load Factor	Durations (hours) <sup>3</sup>	Pollutant Emissions (lbs/well pad)												
				CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub> <sup>4</sup>	VOC	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Form.	Benzene	Toluene	Xylene
bulldozer	300	0.4	70	39.82	144.63	12.82	12.82	0.47	13.89	9660.0	0.47	0.29	0.07	0.05	0.02	0.02
grader	165	0.4	70	24.95	75.98	8.04	8.04	0.28	5.60	5313.0	0.26	0.16	0.04	0.03	0.01	0.01
motor grader	165	0.4	70	24.95	75.98	8.04	8.04	0.28	5.60	5313.0	0.26	0.16	0.04	0.03	0.01	0.01
backhoe	100	0.4	70	15.12	46.05	4.87	4.87	0.17	3.40	3220.0	0.16	0.10	0.02	0.02	0.01	0.01
TOTAL				104.85	342.65	33.76	33.76	1.19	28.49	23506.0	1.13	0.70	0.17	0.13	0.06	0.04

Notes:

<sup>1</sup>AP-42, Volume II - Mobile Sources (EPA 1985) "Emissions Factors for Construction Equipment"

<sup>2</sup>PM<sub>2.5</sub> emissions assumed equal to PM<sub>10</sub> emissions.

<sup>3</sup> Assumes 10 hours per day for 7 days.

<sup>4</sup> Ultra Low Sulfur adjustment based on 15 ppm Ultra Low Sulfur diesel fuel sulfur content compared to 500 ppm (0.05 percent) #2 diesel fuel sulfur content.

<sup>5</sup> Emission factor for track type tractor

<sup>6</sup> From AP-42 Section 3-3 Table 3.3-1 "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines"

<sup>7</sup> Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Gas Industry - Table 4-9 (2004) - N<sub>2</sub>O emissions of 0.08 g/L of diesel fuel. Diesel density 850 g/L; heating value 19,300 Btu/lb.

Table 5.4 Pad Construction Vehicle Exhaust

Emission Source: WELL PAD CONSTRUCTION - VEHICLE EXHAUST EMISSIONS

Emission Equation: Emissions (TPY) = grams/VMT x VMT / 453.59 grams / 2000 lbs

Equipment	Emission Factors (g/VMT) <sup>1,2,3</sup>									
	CO	NOx	PM10	PM2.5 <sup>4</sup>	SO2	VOC	CO <sub>2</sub> <sup>5</sup>	CH <sub>4</sub> <sup>6</sup>	N <sub>2</sub> O <sup>7</sup>	Formaldehyde <sup>8</sup>
HD Diesel Engine Trucks (HDDV)	17.06	6.49	n/a	n/a	0.32	4.82	1700	0.070	0.0432	0.0107
LD Diesel Trucks (60 percent) <sup>9</sup> (LDDV)	2.53	1.18	n/a	n/a	n/a	0.74	230	0.018	0.0505	0.0285
LD Gas Trucks (40 percent) (LDGV)	9.659	0.651	n/a	n/a	n/a	0.562	330	0.119	0.0541	0.0085

Equipment	Class of Vehicle	Days on Location	Number of Vehicles	Number of Round Trips Per Day	Round Trip Distance (mi)	VMT (mi)	Pollutant Emissions (lbs/well pad)											
							CO	NOx	PM10	PM2.5	SO2 <sup>10</sup>	VOC	CO2	CH4	N2O	Formaldehyde	Benzene	Toluene
low boy hauler	HDDV	2	1	5	6	60	2.26	0.86	na	na	0.001	0.64	224.87	0.0093	0.0057	0.0014	0.0011	0.0005
gravel hauler	HDDV	3	3	10	6	540	20.31	7.73	na	na	0.011	5.74	2,023.85	0.0637	0.0515	0.0127	0.0101	0.0044
water truck (road dust control) - 40 bbls	HDDV	3	1	6	6	108	4.06	1.55	na	na	0.002	1.15	404.77	0.0167	0.0103	0.0025	0.0020	0.0009
light duty vehicles (employee access) - Diesel	LDDV	7	1	1	6	42	0.23	0.11	na	na	na	0.07	21.30	0.0016	0.0047	0.0026	0.0014	0.0003
light duty vehicles (employee access) - Gas	LDGV	7	1	1	6	42	0.89	0.06	na	na	na	0.05	30.56	0.0110	0.0050	0.0008	0.0014	0.0003
TOTAL							27.76	10.30	na	na	0.015	7.64	2,705.35	0.1224	0.0772	0.0201	0.0160	0.0065

Notes:

<sup>1</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Heavy Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 2001+ model year (EPA 1995).

<sup>2</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 1990+ model year for NOx, 1984+ model year for CO and HC (EPA 1995).

<sup>3</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Gasoline Trucks" high altitude, "aged" with 50,000 miles service, 1998+ model year (EPA 1995).

<sup>4</sup> PM2.5 emissions assumed equal to PM10 emissions (no PM emission factors available from EPA).

<sup>5</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry, Table 4-11 (HDDV diesel non-semi truck, LDGT average gasoline car, LDDV large diesel car), CO2 Mobile Source Emission Factors, American Petroleum Institute (2004).

<sup>6</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for CH4, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>7</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for N2O, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>8</sup> AP-42, Section 3.3, "Gasoline and Diesel Industrial Engines, Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines"

<sup>9</sup> For light duty vehicles (pickup trucks), 60 percent would be diesel-powered, and 40 percent would be gas.

<sup>10</sup> Included in the Pollutant Emissions is the Ultra Low Sulfur adjustment based on 15 ppm Ultra Low Sulfur diesel fuel sulfur content compared to 500 ppm (0.05 percent) #2 diesel fuel sulfur content (15/500=0.03)

Table 5.5 Well Construction Road Dust

Emission Source: WELL CONSTRUCTION - VEHICLE ROAD DUST EMISSIONS

Emission Factor From: AP-42, Section 13.2.2 (EPA 2006)  
"Unpaved Roads" – Industrial roads

Explanation:

Emission Factor Equation:  $E = k \times (s/12)^a \times (W/3)^b$

Where:

- E = Size-specific emission factor (lb/VMT)
- s = Surface material silt content (%)
- W = Mean vehicle weight (tons)
- k = Empirical constant, particle size multiplier
- a = Empirical constant
- b = Empirical constant

Data:

- k = 1.5 for PM10
- k = 0.15 for PM2.5
- a = 0.9 for PM10 and PM2.5
- b = 0.45 for PM10 and PM2.5

Vehicle	Number of Round Trips per Day	Days on Location	Number of Vehicles	Total Number of Round Trips (per year?)	Mean Vehicle Weight (tons)	Silt Content <sup>1</sup> (%)	Vehicle Miles Travelled per Vehicle (VMT/vehicle)	Control Efficiency	PM10 Emission Factor (lb/VMT)	PM2.5 Emission Factor (lb/VMT)	Uncontrolled PM10 Emissions (lbs/pad)	Uncontrolled PM2.5 Emissions (lbs/pad)	Controlled PM10 Emissions (lbs/pad)	Controlled PM2.5 Emissions (lbs/pad)
Fuel tanker	1	1	1	1	40	24	6	50%	8.98	0.90	0.03	0.00	0.01	0.00
Logging truck	1	2	1	2	26	24	6	50%	7.40	0.74	0.04	0.00	0.02	0.00
Cementer truck	1	2	1	2	40	24	6	50%	8.98	0.90	0.05	0.01	0.03	0.00
Cement supply truck	1	2	2	4	40	24	6	50%	8.98	0.90	0.11	0.01	0.05	0.01
Casing crew	1	2	1	2	6	24	6	50%	3.82	0.38	0.02	0.00	0.01	0.00
Laydown machine	1	2	1	2	26	24	6	50%	7.40	0.74	0.04	0.00	0.02	0.00
Water truck	2	37	1	74	40	24	6	50%	8.98	0.90	1.99	0.20	1.00	0.10
Light duty vehicles (trips for bits)	2	5	1	10	6	24	6	50%	3.82	0.38	0.11	0.01	0.06	0.01
Light duty vehicles (employee access)	1	37	11	407	4.6	24	6	50%	3.39	0.34	4.14	0.41	2.07	0.21
Rig hauler	5	2	1	10	40	24	6	50%	8.98	0.90	0.27	0.03	0.13	0.01
<b>TOTAL</b>													<b>3.41</b>	<b>0.34</b>

<sup>1</sup>Silt content from AP-42 Table 13.2.2-1 for a freshly graded haul road.

Table 5.6 Well Construction Vehicle Exhaust

Emission Source: WELL CONSTRUCTION - VEHICLE EXHAUST EMISSIONS

Emission Equation: Emissions (TPY) = grams/VMT x VMT / 453.59 grams / 2000 lbs

Equipment	Emission Factors (g/VMT) <sup>1,2,3</sup>									
	CO	NOx	PM10	PM2.5 <sup>4</sup>	SO2	VOC	CO2 <sup>5</sup>	CH4 <sup>6</sup>	N2O <sup>7</sup>	Formaldehyde <sup>8</sup>
HD Diesel Engine Trucks (HDDV)	17.06	6.49	n/a	n/a	0.32	4.82	1700	0.070	0.0432	0.0107
LD Diesel Trucks (60 percent) <sup>9</sup> (LDDV)	2.53	1.18	n/a	n/a	n/a	0.74	230	0.018	0.0505	0.0286
LD Gas Trucks (40 percent) (LDGV)	9.659	0.651	n/a	n/a	n/a	0.562	330	0.119	0.0541	0.0085

Equipment	Class of Vehicle	Days on Location <sup>10</sup>	# of Vehicles	Number of Round Trips Per Day	Round Trip Distance (mi)	VMT (mi)	Pollutant Emissions (lbs/well pad)									
							CO	NOx	PM10	PM2.5	SO2 <sup>11</sup>	VOC	CO2	CH4	N2O	Formaldehyde
Fuel tanker	HDDV	5	1	1	6	30	1.13	0.43	na	na	0.001	0.32	112	0.0046	0.0029	0.0007
Logging truck	HDDV	2	1	1	6	12	0.45	0.17	na	na	0.000	0.13	45	0.0019	0.0011	0.0003
Cement truck	HDDV	2	1	1	6	12	0.45	0.17	na	na	0.000	0.13	45	0.0019	0.0011	0.0003
Cement supply truck	HDDV	2	2	1	6	24	0.90	0.34	na	na	0.001	0.26	90	0.0037	0.0023	0.0006
Casing crew	HDDV	2	1	1	6	12	0.45	0.17	na	na	0.000	0.13	45	0.0019	0.0011	0.0003
Laydown machine	HDDV	2	1	1	6	12	0.45	0.17	na	na	0.000	0.13	45	0.0019	0.0011	0.0003
Water truck (100 BBL)	HDDV	37	1	2	6	444	16.70	6.35	na	na	0.009	4.72	1,664	0.0688	0.0423	0.0105
Light duty vehicles (trips for bits)	LDDV	5	1	2	6	60	0.33	0.16	na	na	na	0.10	30	0.0023	0.0067	0.0038
Light duty vehicles (employee access) - Diesel	LDDV	37	8	1	6	1,776	9.91	4.62	na	na	na	2.90	901	0.0692	0.1978	0.1118
Light duty vehicles (employee access) - Gas	LDGV	37	3	1	6	666	14.18	0.96	na	na	na	0.83	485	0.1746	0.0794	0.0125
Rig hauler	HDDV	2	1	5	6	60	2.26	0.86	na	na	0.04	0.64	224.87	0.01	0.01	0.00
TOTAL (POUNDS)							47	14	0	0	0.05	10	3,687	0.34	0.34	0.14

Notes:

<sup>1</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Heavy Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 2001+ model year (EPA 1995).

<sup>2</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 1990+ model year for NOx, 1984+ model year for CO and HC (EPA 1995).

<sup>3</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Gasoline Trucks" high altitude, "aged" with 50,000 miles service, 1998+ model year (EPA 1995).

<sup>4</sup> PM2.5 emissions assumed equal to PM10 emissions

<sup>5</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry, Table 4-11 (HDDV diesel non-semi truck, LDGT average gasoline car, LDDV large diesel car), CO2 Mobile Source Emission Factors, American Petroleum Institute (2004).

<sup>6</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for CH4, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>7</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for N2O, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>8</sup> AP-42, Section 3.3, "Gasoline and Diesel Industrial Engines, Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines"

<sup>9</sup> For light duty vehicles (pickup trucks), 60 percent would be diesel-powered, and 40 percent would be gas.

<sup>10</sup> Well Construction - total of 37 days assumed on location: 2 days for rig move, 2 days to rig up, 30 days drilling, 3 days rig down

<sup>11</sup> Included in the Pollutant Emissions is the Ultra Low Sulfur adjustment based on 15 ppm Ultra Low Sulfur diesel fuel sulfur content compared to 500 ppm (0.05 percent) #2 diesel fuel sulfur content (15 / 500 = 0.03).



Table 5.7 Construction Drilling Emissions 2

Emission Source: WELL CONSTRUCTION - DRILLING ENGINES EMISSIONS - Tier 2

Emission Equation: Emissions (lb/well) = EF (g/hp-hr) x Total Horsepower (hp) x LF x Drilling Duration (days/well) x Drilling Duration (hrs/day) / 453.59 g/lb

Pollutant	Pollutant Emission Factor <sup>1</sup> (g/hp-hr)	Total Horsepower All Engines <sup>2</sup> (hp)	Overall Load Factor	Drilling Activity Duration (days/well)	Drilling Activity Duration (hrs/day)	Emissions (lb/well)	Emissions (lb/hr/well)
CO	2.60	4,450	0.40	30	24	7,346.19	10.20
NO <sub>x</sub> <sup>3</sup>	3.80	4,450	0.40	30	24	10,736.74	14.91
SO <sub>2</sub> <sup>4</sup>	0.0279	4,450	0.40	30	24	78.82	0.11
VOC	1.00	4,450	0.40	30	24	2,825.46	3.92
PM <sub>10</sub>	0.15	4,450	0.40	30	24	423.82	0.59
PM <sub>2.5</sub> <sup>5</sup>	0.15	4,450	0.40	30	24	423.82	0.59
CO <sub>2</sub> <sup>6</sup>	521.63	4,450	0.40	30	24	1,473,840.00	2,047.00
CH <sub>4</sub> <sup>7</sup>	2.52E-02	4,450	0.40	30	24	71.09	0.10
N <sub>2</sub> O <sup>8</sup>	1.55E-02	4,450	0.40	30	24	43.75	0.06
Formaldehyde <sup>9</sup>	3.75E-03	4,450	0.40	30	24	10.59	0.01
Benzene <sup>9</sup>	2.96E-03	4,450	0.40	30	24	8.37	0.01
Toluene <sup>9</sup>	1.30E-03	4,450	0.40	30	24	3.67	0.01
Xylene <sup>9</sup>	9.05E-04	4,450	0.40	30	24	2.56	0.00

Notes:

<sup>1</sup>Emission factors for Tier 2 engines taken from "Control of Emissions of Air Pollution From Nonroad Diesel Engines: Final Rule" (63 FR 56970, Oct. 23, 1998) for engines greater than 750 hp and from Diesel Net, Emissions Standards: USA: Nonroad Diesel Engines, Table 1, "EPA Tier 1-3 Nonroad Diesel Engine Emission Standards, g/kWh (g/bhp-hr)." <http://www.dieselnet.com/standards/us/nonroad.php>

<sup>2</sup>Drilling engine total horsepower is based on two 1,500, two 600, and one 250 hp engine, fueled with ultra low sulfur diesel fuel (15 ppm).

<sup>3</sup>For Tier 2 engines, the combined non-methane hydrocarbon and NO<sub>x</sub> emission rate is 4.8 g/bhp-hr. Emission calculations presented here assume 3.8 g/bhp-hr for NO<sub>x</sub> and 1.0 g/bhp-hr for VOC.

<sup>4</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines". Emission rate of 0.00205 lb/hp-hr converts to 0.0279 g/hp-hr when converting units and adjusting for ultra-low sulfur fuel (15 ppm).

<sup>5</sup>PM<sub>2.5</sub> assumed equivalent to PM<sub>10</sub> for drilling engines.

<sup>6</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines"; lb/hp-hr = pounds per horsepower-hour. (1.15 lb/hp-hr)

<sup>7</sup>Based on methane emissions of 0.13 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>8</sup>Based on nitrous oxide emissions of 0.08 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>9</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines", converted from lb/MMBtu to lb/hp-hr using an average brake-specific fuel consumption (BSFC) of 7,000 Btu/hp-hr.



Table 5.8 Drilling Engines Tier 4 2011

Emission Source: WELL CONSTRUCTION - DRILLING ENGINES EMISSIONS - Tier 4a (2011)

Emission Equation: Emissions (lb/well) = EF (g/hp-hr) x Total Horsepower (hp) x LF x Drilling Duration (days/well) x Drilling Duration (hrs/day) / 453.59 g/lb

Pollutant	Pollutant Emission Factor <sup>1</sup> (g/hp-hr)	Total Horsepower All Engines <sup>2</sup> (hp)	Overall Load Factor	Drilling Activity Duration (days/well)	Drilling Activity Duration (hrs/day)	Emissions (lb/well)	Emissions (lb/hr/well)
CO	2.60	4,450	0.40	30	24	7,346.19	10.20
NO <sub>x</sub>	0.50	4,450	0.40	30	24	1,412.73	1.96
SO <sub>2</sub> <sup>3</sup>	0.0279	4,450	0.40	30	24	78.82	0.11
VOC	0.30	4,450	0.40	30	24	847.64	1.18
PM <sub>10</sub>	0.075	4,450	0.40	30	24	211.91	0.29
PM <sub>2.5</sub> <sup>4</sup>	0.075	4,450	0.40	30	24	211.91	0.29
CO <sub>2</sub> <sup>5</sup>	521.63	4,450	0.40	30	24	1,473,840.00	2,047.00
CH <sub>4</sub> <sup>6</sup>	2.52E-02	4,450	0.40	30	24	71.09	0.10
N <sub>2</sub> O <sup>7</sup>	1.55E-02	4,450	0.40	30	24	43.75	0.06
Formaldehyde <sup>8</sup>	3.75E-03	4,450	0.40	30	24	10.59	0.01
Benzene <sup>8</sup>	2.96E-03	4,450	0.40	30	24	8.37	0.01
Toluene <sup>8</sup>	1.30E-03	4,450	0.40	30	24	3.67	0.01
Xylene <sup>8</sup>	9.05E-04	4,450	0.40	30	24	2.56	0.00

Notes:

<sup>1</sup>Emission factors for Tier 4 engines taken from "Control of Emissions of Air Pollution From Nonroad Diesel Engines and Fuel" (69 FR 38980, June 29, 2004) for engines used in generator sets greater than 1,200 hp and from Diesel Net, Emissions Standards: USA: Nonroad Diesel Engines, Table 4, "EPA Tier 4 Emission Standards - Engines Above 560 kW, g/kWh (g/bhp-hr)." Available on-line at <http://www.dieselnets.com/standards/us/offroad.html>.

<sup>2</sup>Drilling engine total horsepower is based on two 1,500, two 600, and one 250 hp engine, fueled with ultra low sulfur diesel fuel (15 ppm).

<sup>3</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines". Emission rate of 0.00205 lb/hp-hr converts to 0.0279 g/hp-hr when converting units and adjusting for ultra-low sulfur fuel (15 ppm).

<sup>4</sup>PM<sub>2.5</sub> assumed equivalent to PM<sub>10</sub> for drilling engines.

<sup>5</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines"; lb/hp-hr = pounds per horsepower-hour. (1.15 lb/hp-hr)

<sup>6</sup>Based on methane emissions of 0.13 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>7</sup>Based on nitrous oxide emissions of 0.08 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>8</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines", converted from lb/MMBtu to lb/hp-hr using an average brake-specific fuel consumption (BSFC) of 7,000 Btu/hp-hr.

Table 5.9 Drilling Engines Tier 4 2015

Emission Source: WELL CONSTRUCTION - DRILLING ENGINES EMISSIONS - Tier 4b (2015)

Emission Equation: Emissions (lb/well) = EF (g/hp-hr) x Total Horsepower (hp) x LF x Drilling Duration (days/well) x Drilling Duration (hrs/day) / 453.59 g/lb

Pollutant	Pollutant Emission Factor <sup>1</sup> (g/hp-hr)	Total Horsepower All Engines <sup>2</sup> (hp)	Overall Load Factor	Drilling Activity Duration (days/well)	Drilling Activity Duration (hrs/day)	Emissions (lb/well)	Emissions (lb/hr/well)
CO	2.60	4,450	0.40	30	24	7,346.19	10.20
NO <sub>x</sub>	0.50	4,450	0.40	30	24	1,412.73	1.96
SO <sub>2</sub> <sup>3</sup>	0.0279	4,450	0.40	30	24	78.82	0.11
VOC	0.14	4,450	0.40	30	24	395.56	0.55
PM <sub>10</sub>	0.022	4,450	0.40	30	24	62.16	0.09
PM <sub>2.5</sub> <sup>4</sup>	0.022	4,450	0.40	30	24	62.16	0.09
CO <sub>2</sub> <sup>5</sup>	521.63	4,450	0.40	30	24	1,473,840.00	2,047.00
CH <sub>4</sub> <sup>6</sup>	2.52E-02	4,450	0.40	30	24	71.09	0.10
N <sub>2</sub> O <sup>7</sup>	1.55E-02	4,450	0.40	30	24	43.75	0.06
Formaldehyde <sup>8</sup>	3.75E-03	4,450	0.40	30	24	10.59	0.01
Benzene <sup>8</sup>	2.96E-03	4,450	0.40	30	24	8.37	0.01
Toluene <sup>8</sup>	1.30E-03	4,450	0.40	30	24	3.67	0.01
Xylene <sup>8</sup>	9.05E-04	4,450	0.40	30	24	2.56	0.00

Notes:

<sup>1</sup>Emission factors for Tier 4 engines taken from "Control of Emissions of Air Pollution From Nonroad Diesel Engines and Fuel: Final Rule" (69 FR 38980, June 29, 2004) for engines used in generator sets greater than 1,200 hp and from Diesel Net, Emissions Standards: USA: Nonroad Diesel Engines, Table 4, "EPA Tier 4 Emission Standards - Engines Above 560 kW, g/kWh (g/bhp-hr)." Available on-line at <http://www.dieselnet.com/standards/us/offroad.html>.

<sup>2</sup>Drilling engine total horsepower is based on two 1,500, two 600, and one 250 hp engine, fueled with ultra low sulfur diesel fuel (15 ppm).

<sup>3</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines". Emission rate of 0.00205 lb/hp-hr converts to 0.0279 g/hp-hr when converting units and adjusting for ultra-low sulfur fuel (15 ppm).

<sup>4</sup>PM<sub>2.5</sub> assumed equivalent to PM<sub>10</sub> for drilling engines.

<sup>5</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-1, "Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines"; lb/hp-hr = pounds per horsepower-hour. (1.15 lb/hp-hr)

<sup>6</sup>Based on methane emissions of 0.13 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>7</sup>Based on nitrous oxide emissions of 0.08 g/L of diesel fuel (diesel density of 850 g/L and heating value of 19,300 Btu/lb) from the "Compendium of GHG Emission Methodologies for the Oil and Gas Industry," Table 4-9 (2004).

<sup>8</sup>AP-42 (EPA 1996), Section 3.3, "Gasoline and Diesel Industrial Engines. Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines", converted from lb/MMBtu to lb/hp-hr using an average brake-specific fuel consumption (BSFC) of 7,000 Btu/hp-hr.

Table 5.10 Completion Flaring

**Emission Source:** WELL COMPLETION AND TESTING - FLARING EMISSIONS

**Emission Factor From:** AP-42, Section 1.4 (EPA 1998)  
"Natural Gas Combustion"

**Emission Equations:** Emissions (TPY) = Average gas emitted (MMscf) x EF (lb/MMscf) / 2000 lbs

**Data:** Average gas  
emitted  
(per well) = 0.4 MMscf  
100% flared, 0% vented

Pollutant	lb/MMscf <sup>2</sup>	Emissions (lb/well)	Duration <sup>2</sup> (hours)	Hourly Emissions per Well (lb/hr/well)
CO	84	33.6	48	0.70
NOx	100	40	48	0.83
PM10	7.6	3.04	48	0.06
PM2.5 <sup>1</sup>	7.6	3.04	48	0.06
SO2	0.6	0.24	48	0.01
VOC	5.5	2.2	48	0.05
CO <sub>2</sub>	120,000	48000	48	1000.00
CH <sub>4</sub>	2.3	0.92	48	0.02
N <sub>2</sub> O	2.2	0.88	48	0.02
Benzene	2.10E-03	8.40E-04	48	1.75E-05
Toluene	3.40E-03	1.36E-03	48	2.83E-05
Hexane	1.81E+00	7.23E-01	48	1.51E-02

Notes:

<sup>1</sup>PM<sub>2.5</sub> emissions assumed equal to PM10 emissions

<sup>2</sup> Assumes there are two days of flaring before going to sales

Table 5.11 Completion Waste Pond

**Emission Source:** WASTE POND EVAPORATION

**Emission Factor From:** CDPHE-APCD - based on tests conducted by Williams E&P

**Emission Factor Equation:** Emissions (TPY) = lbs VOC/bbl x bbl water to waste pit / 2000 lbs

Barrels	Emission Factor <sup>1</sup> (lbs VOC/bbl)	Emissions (lb/well)
10,000	0.07	700

<sup>1</sup> Based on test conducted by Williams E&P for CDPHE-APCD  
(Need to find a better emission factor)

Table 5.12 Completion Road Dust

Emission Source: WELL COMPLETION AND TESTING - VEHICLE ROAD DUST EMISSIONS

Emission Factor From: AP-42, Section 13.2.2 (EPA 2006)  
"Unpaved Roads" – Industrial roads

Emission Factor Equation:  $E = k \times (s/12)^a \times (W/3)^b$

Where:  
E = Size-specific emission factor (lb/VMT)  
s = Surface material silt content (%)  
W = Mean vehicle weight (tons)  
k = Empirical constant, particle size multiplier  
a = Empirical constant  
b = Empirical constant

Data:  
k = 1.5 for PM10  
k = 0.15 for PM2.5  
a = 0.9 for PM10 and PM2.5  
b = 0.45 for PM10 and PM2.5

Vehicle	Number of Round Trips per Day	Days on Location	Number of Vehicles	Total Number of Round Trips (per year?)	Mean Vehicle Weight (tons)	Silt Content <sup>1</sup> (%)	Vehicle Miles Travelled per Vehicle (VMT/vehicle)	Control Efficiency	PM10 Emission Factor (lb/VMT)	PM2.5 Emission Factor (lb/VMT)	Uncontrolled PM10 Emissions (lbs/pad)	Uncontrolled PM2.5 Emissions (lbs/pad)	Controlled PM10 Emissions (lbs/pad)	Controlled PM2.5 Emissions (lbs/pad)
Casing hauler	6	4	1	24	40	24	6	50%	8.98	0.90	1293	129	647	65
Completion rig	1	1	1	1	61.5	24	6	50%	10.90	1.09	65	7	33	3
Logging truck	2	2	1	4	26	24	6	50%	7.40	0.74	178	18	89	9
Sand truck	3	5	1	15	40	24	6	50%	8.98	0.90	808	81	404	40
Frac pumper	1	2	13	26	40	24	6	50%	8.98	0.90	1401	140	700	70
Fracmaster delivery	1	2	2	4	40	24	6	50%	8.98	0.90	216	22	108	11
Water truck (road dust control)	3	5	1	15	40	24	6	50%	8.98	0.90	808	81	404	40
Light duty vehicles (employee access)	2	10	6	120	4.6	24	6	50%	3.39	0.34	2443	244	1221	122
Water truck - frac water	12	8	2	192	40	24	6	50%	8.98	0.90	10344	1034	5172	517
TOTAL													8778	878

<sup>1</sup>Silt content from AP-42 Table 13.2.2-1 for a freshly graded haul road.

Table 5.13 Completion Vehicle Exhaust

Emission Source: WELL COMPLETION AND TESTING - VEHICLE EXHAUST EMISSIONS

Emission Equation: Emissions (TPY) = grams/VMT x VMT / 453.59 grams / 2000 lbs

Equipment	CO	NOx	PM10	PM2.5 <sup>a</sup>	SO2	VOC	CO2 <sup>b</sup>	CH4 <sup>c</sup>	N2O <sup>d</sup>	Formaldehyde <sup>e</sup>	Benzene <sup>f</sup>	Toluene <sup>g</sup>	Xylene <sup>h</sup>
HD Diesel Engine Trucks (HDDV)	17.06	6.49	n/a	n/a	0.32	4.82	1700	0.07028112	0.0432	0.0107	0.0065	0.00371	0.0026
LD Diesel Trucks (60 percent) <sup>i</sup> (LDDV)	2.53	1.18	n/a	n/a	n/a	0.74	230	0.01768291	0.0505	0.0286	0.0148	0.00371	0.0026
LD Gas Trucks (40 percent) (LDGV)	9.659	0.651	n/a	n/a	n/a	0.562	330	0.11893728	0.0541	0.0085	0.0151	0.00371	0.0026

Equipment	Class of Vehicle	Days on Location <sup>16</sup>	# of Vehicles	Number of Round Trips Per Day	Round Trip Distance (mi)	VMT (mi)	Pollutant Emissions (lbs/well pad)													
							CO	NOx	PM10	PM2.5	SO2 <sup>15</sup>	VOC	CO2	CH4	N2O	Formaldehyde	Benzene	Toluene	Xylene	
Casing hauler	HDDV	4	1	6	6	144	5	2	na	na	0.003	2	540	0.022	0.014	0.003	0.003	0.001	0.001	
Completion rig	HDDV	1	1	1	6	6	0	0	na	na	0.000	0	22	0.001	0.001	0.000	0.000	0.000	0.000	
Logging truck	HDDV	2	1	2	6	24	1	0	na	na	0.001	0	90	0.004	0.002	0.001	0.000	0.000	0.000	
Sand truck	HDDV	5	1	3	6	90	3	1	na	na	0.002	1	337	0.014	0.009	0.002	0.002	0.001	0.001	
Frac pumper	HDDV	2	13	1	6	156	6	2	na	na	0.003	2	595	0.024	0.016	0.004	0.003	0.001	0.001	
Fracmaster delivery	HDDV	2	2	1	6	24	1	0	na	na	0.001	0	90	0.004	0.002	0.001	0.000	0.000	0.000	
Water truck (road dust control)	HDDV	5	1	3	6	90	3	1	na	na	0.002	1	337	0.014	0.009	0.002	0.002	0.001	0.001	
Light duty vehicles (employee access) - Diesel	LDGV	10	4	2	6	480	3	1	na	na	na	1	243	0.019	0.053	0.030	0.016	0.004	0.003	
Light duty vehicles (employee access) - Gas	LDGV	10	2	2	6	240	5	0	na	na	na	0	175	0.063	0.029	0.004	0.008	0.002	0.001	
Water truck - frac water	HDDV	8	2	12	6	1,152	43	16	na	na	0.024	12	4,318	0.178	0.110	0.027	0.022	0.009	0.007	
130 BBL	HDDV	8	2	12	6	1,152	43	16	na	na	0.024	12	4,318	0.178	0.110	0.027	0.022	0.009	0.007	
TOTAL (POUNDS)							71	26	0	0	0.04	19	6,737	0.34	0.24	0.07	0.06	0.02	0.01	

Notes:

<sup>1</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Heavy Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 2001+ model year (EPA 1995).

<sup>2</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 1990+ model year for CO and HC (EPA 1995).

<sup>3</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Gasoline Trucks" high altitude, "aged" with 50,000 miles service, 1998+ model year (EPA 1995).

<sup>4</sup> PM2.5 emissions assumed equal to PM10 emissions (no PM emission factors available from EPA).

<sup>5</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry, Table 4-11 (HDDV diesel non-semi truck, LDGT average gasoline car, LDDV large diesel car), CO2 Mobile Source Emission Factors, American Petroleum Institute (2004).

<sup>6</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for CH4, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>7</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for N2O, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>8</sup> AP-42, Section 3.3, "Gasoline and Diesel Industrial Engines, Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines"

<sup>9</sup> For light duty vehicles (pickup trucks), 60 percent would be diesel-powered, and 40 percent would be gas.

<sup>10</sup> Well Completion and Testing - total of 10 days assumed on location: 8 days completion, 2 days testing.

<sup>11</sup> Included in the Pollutant Emissions is the Ultra Low Sulfur adjustment based on 15 ppm Ultra Low Sulfur diesel fuel sulfur content compared to 500 ppm (0.05 percent) #2 diesel fuel sulfur content (15 / 500 = 0.03).

Table 5.14 Completion Frac Pump Engines

Emission Source: COMPLETION - FRAC PUMP ENGINES

Emission Factor From: AP-42, Section 3.3 (EPA 1996)  
 "Gasoline and Diesel Industrial Engines"

Emission Equation: Emissions (lb/well) = grams/hp-hr x hrs of use x Load Factor x hp / 453.59 grams

Data: Engine Horsepower: 2200 hp  
 Operating Load Factor: 0.6  
 Duration (hours)<sup>2</sup>: 168 hours

Pollutant	Emission Factors g/hp-hr	Emissions (lbs/well pad)
CO	3.03E+00	1481.36
NOx	14.06129	6874.56
PM <sub>10</sub>	9.98E-01	487.87
PM <sub>2.5</sub> <sup>1</sup>	9.98E-01	487.87
SO <sub>2</sub>	9.30E-01	454.61
VOC	1.14E+00	557.53
CO <sub>2</sub>	521.63	255024.00
CH <sub>4</sub> <sup>3</sup>	1.16E-01	56.62
Form.	3.75E-03	1.83
Benzene	2.96E-03	1.45
Toluene	1.30E-03	0.63
Xylene	9.05E-04	0.44

Notes:

<sup>1</sup> PM<sub>2.5</sub> emissions assumed equal to PM<sub>10</sub> emissions.

<sup>2</sup> Assumes 12 hours per day for 14 days.

<sup>3</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry Table 4-5  
 (assumes TOC contains 10 wt% CH<sub>4</sub> in exhaust).



Table 5.15 Production Heater

**Emission Source:** PRODUCTION - HEATER/TREATER EMISSIONS

**Emission Factor From:** AP-42, Section 1.4 (EPA 1998)  
 "Natural Gas Combustion"

**Emission Equation:** Emissions (TPY) = Emission Factor (lbs/MMscf) x Fuel Heating Value (Btu/scf) x Heat Rate (MMBtu/hr) x Hours of Operation (hrs/yr) / 2000 lbs

**Data:** Fuel Heating Value = 1020 Btu/scf  
 Heat Rate = 0.5 MMBtu/hr  
 Hours of Operation = 4380 hrs/yr

**Assumptions:** 500K BTU/hr heater/treater; Operates 6 months out of the year

Pollutant	Emission Factor <sup>1</sup> (lb/MMscf)	Emissions (lb/hr)	Emissions (lb/well pad)
CO	84	0.04	180.35
NOx	100	0.05	214.71
PM10	7.6	3.73E-03	16.32
PM2.5	7.6	3.73E-03	16.32
SO2	0.6	2.94E-04	1.29
VOC	5.5	2.70E-03	11.81
CO2	120000	58.82	257,647.06
CH4	2.3	0.00	4.94
N2O	2.2	0.00	4.72
Formaldehyde	0.075	0.00	0.16
Benzene	0.0021	0.00	0.00
Ethylbenzene	NA	NA	NA
Toluene	0.0034	0.00	0.01
Xylene	NA	NA	NA

AP-42 does not have separate emission factors at different loads; therefore, it is assumed the emission factors listed are applicable at all loads.

Table 5.16 Production Tanks

<b>Emission Source:</b>	<b>PRODUCTION - WELL PAD TANKS</b>
<b>Emission Factor From:</b>	APCD's PS Memo 05-01 document, Section 4.1 for remainder of Colorado
<b>Assumptions:</b>	4 - 400 bbl Condensate Tanks 2 - 400 bbl Produced Water Tanks <sup>1</sup>
<b>Data:</b>	Condensate Throughput: 150 bbl/day/pad Condensate Throughput: 4500 bbl/month/pad Condensate Throughput: 54000 bbl/year/pad Control efficiency <sup>2</sup> (%): 95%

Pollutant	Emission Factor (lbs/bbl)	Uncontrolled Emissions (lb/pad)	Controlled Emissions <sup>2</sup> (lb/pad)	Emissions (lb/hr)	Uncontrolled Emissions (tons/yr)	Controlled Emissions (tons/yr)
VOC	11.8	637,200.00	31,860.00	72.74	318.60	15.93
Benzene	0.034	1,836.00	91.80	0.21	0.92	0.92
n-Hexane	0.185	9,990.00	499.50	1.14	5.00	5.00

Notes:

<sup>1</sup> Produced water tanks are assumed to have minimal emissions and they are not quantified.

<sup>2</sup> Assumed to have 95% control based on (CPDHE 2007) Regulation 7 "Emissions of Volatile Organic Compounds (5 CCR 1001-9)"  
Effective Statewide May 1, 2008 (CPDHE 2007 Reg 7, Sec XVII)  
95 percent on Condensate Tank (with uncontrolled VOC emissions >20 TPY)

Table 5.17 Production Gas Generator

Emission Source:	PRODUCTION - GAS GENERATOR <sup>1</sup>		
Emission Factor From:	AP-42, Section 3.2 (EPA 2000) "Natural Gas-fired Reciprocating Engines"		
Assumptions:	Gas Generator Power:	25 kW	
	Horsepower:	33.5 hp	
	Heat Rate:	0.0853 MMBtu/hr	
	Hours per Year:	8760 hrs/yr	
	Load Factor:	100 %	
Emission Equation:	Emissions (lb/hr) = EF (lbs/MMBtu) x MMBtu/hr x 5764 hrs / 2000 lbs		

Pollutant	Emission Factor at 90 - 100% Load <sup>2</sup> (lb/MMBtu)	Emission Factor at <90% Load <sup>3</sup> (lb/MMBtu)	Emissions (lb/hr)	Emissions (lb/yr)	Emissions (tons/yr)	Emissions (lb/well)
CO	4.19E+00	5.57E-01	3.57E-01	3,130.89	1.57	3,130.89
NO <sub>x</sub>	2.42	8.47E-01	2.06E-01	1,808.29	0.90	1,808.29
SO <sub>2</sub>	5.88E-04	5.88E-04	5.02E-05	0.44	0.00	0.44
PM <sub>10</sub>	7.71E-05	7.71E-05	6.58E-06	0.06	0.00	0.06
PM <sub>2.5</sub>	7.71E-05	7.71E-05	6.58E-06	0.06	0.00	0.06
CO <sub>2</sub>	110.00	110.00	9.38E+00	82,195.08	41.10	82,195.08
Benzene	4.40E-04	4.40E-04	3.75E-05	0.33	0.00	0.33
Ethylbenzene	3.97E-05	3.97E-05	3.39E-06	0.03	0.00	0.03
Form.	5.52E-02	5.52E-02	4.71E-03	41.25	0.02	41.25
Hexane	4.45E-04	4.45E-04	3.80E-05	0.33	0.00	0.33
Toluene	4.08E-04	4.08E-04	3.48E-05	0.30	0.00	0.30
Xylene	1.84E-04	1.84E-04	1.57E-05	0.14	0.00	0.14

<sup>1</sup> Well head engine electric driven by natural gas fired generator until power lines run to locations

<sup>2</sup> AP-42 emission factors for NO<sub>x</sub> and CO take into account a load factor of 90 - 105%. All other pollutant emission factors are applicable at all loads. Emission Factors for NO<sub>x</sub> and CO were derived from 40 CFR Part 1048 subpart B. They are 3.8 g/Kw-hr for HC+NO<sub>x</sub>, and 6.5 g/Kw-hr for CO. To be conservative, all emissions were assumed to be NO<sub>x</sub>, and no portion of the HC+NO<sub>x</sub> emissions factor was assumed to be HC.

<sup>3</sup> AP-42 emission factors for NO<sub>x</sub> and CO take into account a load factor of <90%. All other pollutant emission factors are applicable at all loads.

Table 5.18 Production Dust

Emission Source:	PRODUCTION - WIND EROSION
Emission Factor From:	EPA-450/3-98-008 (EPA 1998) "Control of Fugitive Dust Sources"
Emission Equation:	TSP (lb/acre/month) = $1.7 \times (s/1.5) \times ([365-p]/235) \times (f/15)$ Emissions (TPY) = TSP x disturbed acreage x 12 months / 2000 lbs
Where:	s = silt content (percent) p = number of days with >.001 in precipitation (not used) f = percent of time wind speed >5.4 (m/s) [equivalent to 12 mph]
Data:	s = 20 percent silt (average) f = 36.6 percent of time wind speed >5.4 (m/s) [equivalent to 12 mph] from Rock Springs FAA Airport (Wyoming)1985, 1987-1990 Disturbed acreage= 8 acres TSP = 85.9 (lb/acre/month)
Assume Control Efficiency:	50% for watering
Assumptions per pad/road:	8 acres per well pad (assumes 4 acre drill pad, 2 acre road, 2 acre other infrastructure)

Particulate	Conversion Factor <sup>1</sup>	Uncontrolled Emissions (lb/month)	Uncontrolled Emissions (lb/year)	Controlled Emissions <sup>2</sup> (lbs/pad/year)
TSP	na	687.21	8,247	4,123.29
PM <sub>10</sub>	0.25	171.80	2,062	1,030.82
PM <sub>2.5</sub>	0.15	103.08	1,237	618.49

Notes:

<sup>1</sup> PM<sub>10</sub> = 0.25\*TSP; PM<sub>2.5</sub> = 0.15\*PM<sub>10</sub>. This conversion factor came from AP-42 13.2.2 background document "Background Document for Revision to Fine Fraction Ratios Used for AP-42 Fugitive Dust Emission Factors" (2006).

<sup>2</sup> Assumes 50% control by watering

Table 5.19 Production Road Dust

Emission Source: WELL PRODUCTION - VEHICLE ROAD DUST EMISSIONS

Emission Factor From: AP-42, Section 13.2.2 (EPA 2006)  
"Unpaved Roads" – Industrial roads

Emission Factor Equation:  $E = k \times (s/12)^a \times (W/3)^b$

Where:  
E = Size-specific emission factor (lb/VMT)  
s = Surface material silt content (%)  
W = Mean vehicle weight (tons)  
k = Empirical constant, particle size multiplier  
a = Empirical constant  
b = Empirical constant

Data:  
k = 1.5 for PM10  
k = 0.15 for PM2.5  
a = 0.9 for PM10 and PM2.5  
b = 0.45 for PM10 and PM2.5

Vehicle	Number of Round Trips per Week	Number of Vehicles	Total Number of Round Trips	Mean Vehicle Weight (tons)	Silt Content <sup>1</sup> (%)	Vehicle Miles Travelled per Vehicle (VMT/vehicle)	Control Efficiency	PM10 Emission Factor (lb/VMT)	PM2.5 Emission Factor (lb/VMT)	Uncontrolled PM10 Emissions (lbs/pad)	Uncontrolled PM2.5 Emissions (lbs/pad)	Controlled PM10 Emissions (lbs/pad)	Controlled PM2.5 Emissions (lbs/pad)
Water truck	2	1	104	40	8.4	6	80%	3.40	0.35	2178	218	436	44
Condensate truck	3	1	156	40	8.4	6	80%	3.49	0.35	3267	327	653	65
Light duty vehicles (employee access)	7	1	364	46	8.4	6	80%	3.72	0.37	8118	812	1624	162
<b>TOTAL</b>										<b>13564</b>	<b>1356</b>	<b>2713</b>	<b>271</b>

<sup>1</sup>Silt content from AP-42 Table 13.2.2-1 for a haul road.

Table 5.20 Production Vehicle Exhaust

Emission Source: WELL PRODUCTION - VEHICLE EXHAUST EMISSIONS

Emission Equation: Emissions (TPY) = grams/VMT x VMT / 453.59 grams / 2000 lbs

Equipment	Emission Factors (g/VMT) <sup>1,3</sup>												
	CO	NOx	PM10	PM2.5 <sup>4</sup>	SO2	VOC	CO2 <sup>5</sup>	CH4 <sup>6</sup>	N2O <sup>7</sup>	Formaldehyde <sup>8</sup>	Benzene <sup>9</sup>	Toluene <sup>9</sup>	Xylene <sup>9</sup>
HD Diesel Engine Trucks (HDDV)	17.06	6.49	n/a	n/a	0.32	4.82	1700	0.070	0.0432	0.0107	0.0065	0.00371	0.0026
LD Diesel Trucks (60 percent) <sup>10</sup> (LDDV)	2.53	1.18	n/a	n/a	n/a	0.74	230	0.016	0.0505	0.0286	0.0148	0.00371	0.0026
LD Gas Trucks (40 percent) (LDGV)	9.659	0.651	n/a	n/a	n/a	0.562	330	0.119	0.0541	0.0065	0.0151	0.00371	0.0026

Equipment	Class of Vehicle	Number of Vehicles	Number of Round Trips Per	Round Trip Distance (mi)	VMT (mi)	Pollutant Emissions (lbs/well pad)												
						CO	NOx	PM10	PM2.5	SO2 <sup>10</sup>	VOC	CO2	CH4	N2O	formaldehyc	Benzene	Toluene	Xylene
Water truck (process water removal)	HDDV	1	2	6	624	23.5	8.9	na	na	0.01	7	2,339	0.10	0.06	0.01	0.01	0.01	0.00
Condensate truck (condensate removal)	HDDV	1	3	6	936	35.2	13.4	na	na	0.02	10	3,508	0.15	0.09	0.02	0.02	0.01	0.01
light duty vehicles (employee access) - Diesel	LDDV	1	7	6	2,184	12.2	5.7	na	na	na	4	1,107	0.09	0.24	0.14	0.07	0.02	0.01
light duty vehicles (employee access) - Gas	LDGV	1	7	6	2,184	46.5	3.1	na	na	na	3	1,589	0.57	0.26	0.04	0.07	0.02	0.01
<b>TOTAL (POUNDS)</b>						<b>70.9</b>	<b>28.0</b>	<b>0</b>	<b>0</b>	<b>0.03</b>	<b>20</b>	<b>8,543</b>	<b>0.90</b>	<b>0.65</b>	<b>0.22</b>	<b>0.17</b>	<b>0.05</b>	<b>0.03</b>

Notes:

<sup>1</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Heavy Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 2001+ model year (EPA 1995).

<sup>2</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Diesel Trucks" high altitude, "aged" with 50,000 miles service, 1990+ model year for NOx, 1984+ model year for CO and HC (EPA 1995).

<sup>3</sup> AP-42, Volume II - Mobile Sources, Appendix H, "Light Duty Gasoline Trucks I" high altitude, "aged" with 50,000 miles service, 1996+ model year (EPA 1995).

<sup>4</sup> PM2.5 emissions assumed equal to PM10 emissions (no PM emission factors available from EPA).

<sup>5</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry, Table 4-11 (HDDV diesel non-semi truck, LDGT average gasoline car, LDDV large diesel car), CO2 Mobile Source Emission Factors, American Petroleum Institute (2004).

<sup>6</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for CH4, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>7</sup> Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry for N2O, Table 4-9 (HDDV moderate control, LDGT oxidation catalyst, LDDT moderate control), Mobile Source Combustion Emission Factors, Table 4-10 (HDDV Diesel heavy truck, LDGT Gasoline light truck, LDDT Diesel light truck), Default Fuel Economy Factors for Different Types of Mobile Sources, American Petroleum Institute (2004).

<sup>8</sup> AP-42, Section 3.3, "Gasoline and Diesel Industrial Engines, Table 3.3-2, "Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines"

<sup>9</sup> For light duty vehicles (pickup trucks), 60 percent would be diesel-powered, and 40 percent would be gas.

<sup>10</sup> included in the Pollutant Emissions is the Ultra Low Sulfur adjustment based on 15 ppm Ultra Low Sulfur diesel fuel sulfur content compared to 500 ppm (0.05 percent) #2 diesel fuel sulfur content (15 / 500 = 0.03).



Table 5.21 Per Well Total 2009

EMISSION SUMMARY - 2009 Emissions by Source Category (lbs/well)															
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<b>Well Pad Construction</b>															
General Activity	--	--	--	230.14	34.52	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2,808.48	280.85	--	--	--	--	--	--	--	--	--	--
Equipment Exhaust	104.85	342.65	33.76	33.76	1.19	28.49	0.17	0.13	0.06	0.04	--	--	23,506	1.13	0.70
Vehicle Exhaust	27.76	10.30	0.01	--	--	7.64	0.02	0.02	0.0065	0.0045	--	--	2,705	0.12	0.08
<b>Subtotal</b>	<b>132.61</b>	<b>352.95</b>	<b>33.77</b>	<b>3,072.38</b>	<b>316.56</b>	<b>36.13</b>	<b>0.19</b>	<b>0.15</b>	<b>0.06</b>	<b>0.05</b>	<b>0.00</b>	<b>0.00</b>	<b>26,211.35</b>	<b>1.26</b>	<b>0.77</b>
<b>Well Construction</b>															
Vehicle Road Dust	--	--	--	3.41	0.34	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	47.22	14.40	0.00	0.00	0.05	10.26	0.14	0.09	0.03	0.02	--	--	3,687	0.34	0.34
Drilling Engines - Tier 2	7,346.19	10,736.74	78.82	423.82	423.82	2,825.46	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09	43.75
Drilling Engines - Tier 4a (2011)	7,346.19	1,412.73	78.82	211.01	211.01	847.64	10.50	8.37	3.67	2.56	--	--	1,473,840	71.09	43.75
Drilling Engines - Tier 4b (2015)	7,346.19	1,412.73	78.82	62.16	62.16	395.50	10.50	8.37	3.67	2.56	--	--	1,473,840	71.09	43.75
<b>Subtotal (with Tier 2 drilling)</b>	<b>7,393.41</b>	<b>10,751.15</b>	<b>78.82</b>	<b>427.23</b>	<b>424.21</b>	<b>2,835.72</b>	<b>10.73</b>	<b>8.46</b>	<b>3.69</b>	<b>2.57</b>	<b>0.00</b>	<b>0.00</b>	<b>1,477,526.72</b>	<b>71.43</b>	<b>44.09</b>
<b>Completion and Testing</b>															
Flaring	33.60	40.00	0	3.04	3.04	2.20	--	0.00	0.00	--	--	1.81	48,000	0.92	0.88
Waste Pond Evaporation	--	--	--	--	--	700.00	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	8,777.68	877.77	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	71.20	25.72	0.04	--	--	19.00	0.07	0.06	0.02	0.01	--	--	6,737	0.34	0.24
Frac Pump Engines	1,481.36	6,874.56	454.61	487.87	487.87	557.53	1.83	1.45	0.63	0.44	--	--	255,024	56.62	--
<b>Subtotal</b>	<b>104.80</b>	<b>65.72</b>	<b>0.28</b>	<b>8,780.72</b>	<b>880.81</b>	<b>721.20</b>	<b>0.07</b>	<b>0.06</b>	<b>0.02</b>	<b>0.01</b>	<b>0.00</b>	<b>1.81</b>	<b>54,736.92</b>	<b>1.26</b>	<b>1.12</b>
<b>CONSTRUCTION TOTAL<sup>1</sup></b>	<b>7,630.81</b>	<b>11,169.81</b>	<b>112.87</b>	<b>12,280.33</b>	<b>1,621.58</b>	<b>3,593.05</b>	<b>10.99</b>	<b>8.67</b>	<b>3.78</b>	<b>2.63</b>	<b>0.00</b>	<b>1.81</b>	<b>1,558,474.99</b>	<b>73.35</b>	<b>45.99</b>
<b>Well Production</b>															
Heater/Treater	180.35	214.71	1.2882	16.3176	16.3176	11.8088	0.16	0.00	0.01	--	--	--	257,647	4.94	4.72
Condensate Tanks	--	--	--	--	--	31,660.00	--	91.80	--	--	--	499.50	--	--	--
Gas Generator	3,130.89	1,808.29	0.44	0.06	0.06	--	41.25	0.33	0.30	0.14	0.03	0.33	82,195	--	--
Wind Blown Dust	--	--	--	1,030.82	618.49	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2,712.74	271.27	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	70.86	28.00	0.03	--	--	20.14	0.22	0.17	0.05	0.03	--	--	8,543	0.90	0.65
<b>Subtotal</b>	<b>3,382.09</b>	<b>2,051.00</b>	<b>1.76</b>	<b>3,759.54</b>	<b>906.14</b>	<b>31,891.95</b>	<b>41.62</b>	<b>92.31</b>	<b>0.36</b>	<b>0.17</b>	<b>0.03</b>	<b>499.83</b>	<b>348,385.18</b>	<b>5.84</b>	<b>5.38</b>
<b>PRODUCTION TOTAL</b>	<b>3,382.09</b>	<b>2,051.00</b>	<b>1.76</b>	<b>3,759.54</b>	<b>906.14</b>	<b>31,891.95</b>	<b>41.62</b>	<b>92.31</b>	<b>0.36</b>	<b>0.17</b>	<b>0.03</b>	<b>499.83</b>	<b>348,385.18</b>	<b>5.84</b>	<b>5.38</b>
<b>CONSTRUCTION AND PRODUCTION TOTAL</b>	<b>11,012.91</b>	<b>13,220.81</b>	<b>114.63</b>	<b>16,040.27</b>	<b>2,527.72</b>	<b>35,485.00</b>	<b>52.62</b>	<b>100.98</b>	<b>4.14</b>	<b>2.81</b>	<b>0.03</b>	<b>501.64</b>	<b>1,906,860.18</b>	<b>79.79</b>	<b>51.36</b>

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.

Table 5.21 Per Well Total 2009, cont.

Emissions by Source Category (tons/well)															
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<b>Well Pad Construction</b>															
General Activity	--	--	--	0.1151	0.0173	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.4042	0.1404	--	--	--	--	--	--	--	--	--	--
Equipment Exhaust	0.0524	0.1713	0.0169	0.0169	0.0006	0.0142	0.0001	0.0001	0.0000	0.0000	--	--	11.7530	0.0006	0.0003
Vehicle Exhaust	0.0139	0.0051	0.0000	--	--	0.0038	0.0000	0.0000	0.0000	0.0000	--	--	1.3527	0.0001	0.0000
<b>Subtotal</b>	<b>0.0663</b>	<b>0.1765</b>	<b>0.0169</b>	<b>1.5362</b>	<b>0.1583</b>	<b>0.0181</b>	<b>0.0001</b>	<b>0.0001</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>13.1057</b>	<b>0.0006</b>	<b>0.0004</b>
<b>Well Construction</b>															
Vehicle Road Dust	--	--	--	0.0017	0.0002	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0236	0.0072	0.0000	0.0000	0.0000	0.0051	0.0001	0.0000	0.0000	0.0000	--	--	1.8434	0.0002	0.0002
Drilling Engines - Tier 2	3.6731	5.3684	0.0394	0.2119	0.2119	1.4127	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4a (2011)	3.0731	0.7054	0.0394	0.1000	0.1000	0.4238	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4b (2015)	3.0731	0.7054	0.0394	0.0311	0.0311	0.1978	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
<b>Subtotal (with Tier 2 drilling)</b>	<b>3.6967</b>	<b>5.3756</b>	<b>0.0394</b>	<b>0.2136</b>	<b>0.2121</b>	<b>1.4179</b>	<b>0.0054</b>	<b>0.0042</b>	<b>0.0018</b>	<b>0.0013</b>	<b>0.0000</b>	<b>0.0000</b>	<b>738.7634</b>	<b>0.0357</b>	<b>0.0220</b>
<b>Completion and Testing</b>															
Flaring	0.0168	0.0200	0.0001	0.0015	0.0015	0.0011	--	0.0000	0.0000	--	--	0.0009	24.0000	0.0005	0.0004
Waste Pond Evaporation	--	--	--	--	--	0.3500	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	4.3888	0.4389	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0356	0.0129	0.0000	--	--	0.0095	0.0000	0.0000	0.0000	0.0000	--	--	3.3685	0.0002	0.0001
Frac Pump Engines	0.7407	3.4373	0.2273	0.2439	0.2439	0.2788	0.0009	0.0007	0.0003	0.0002	--	--	127.5120	0.0283	--
<b>Subtotal</b>	<b>0.0524</b>	<b>0.0329</b>	<b>0.0001</b>	<b>4.3904</b>	<b>0.4404</b>	<b>0.3606</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0009</b>	<b>27.3685</b>	<b>0.0006</b>	<b>0.0006</b>
<b>CONSTRUCTION TOTAL<sup>1</sup></b>	<b>3.8154</b>	<b>5.5849</b>	<b>0.0564</b>	<b>6.1402</b>	<b>0.8108</b>	<b>1.7965</b>	<b>0.0055</b>	<b>0.0043</b>	<b>0.0019</b>	<b>0.0013</b>	<b>0.0000</b>	<b>0.0009</b>	<b>779.2375</b>	<b>0.0370</b>	<b>0.0230</b>
<b>Well Production</b>															
Heater/Treater	0.0902	0.1074	0.0006	0.0082	0.0082	0.0059	0.0001	0.0000	0.0000	--	--	--	128.8235	0.0025	0.0024
Condensate Tanks	--	--	--	--	--	15.9300	--	0.0459	--	--	--	0.2498	--	--	--
Gas Generator	1.5654	0.9041	0.0002	0.0000	0.0000	--	0.0206	0.0002	0.0002	0.0001	0.0000	0.0002	41.0975	--	--
Wind Blown Dust	--	--	--	0.5154	0.3092	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.3564	0.1356	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0354	0.0140	0.0000	--	--	0.0101	0.0001	0.0001	0.0000	0.0000	--	--	4.2715	0.0004	0.0003
<b>Subtotal</b>	<b>1.6910</b>	<b>1.0255</b>	<b>0.0009</b>	<b>1.8800</b>	<b>0.4531</b>	<b>15.9460</b>	<b>0.0208</b>	<b>0.0462</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.0000</b>	<b>0.2499</b>	<b>174.1926</b>	<b>0.0029</b>	<b>0.0027</b>
<b>PRODUCTION TOTAL</b>	<b>1.6910</b>	<b>1.0255</b>	<b>0.0009</b>	<b>1.8800</b>	<b>0.4531</b>	<b>15.9460</b>	<b>0.0208</b>	<b>0.0462</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.0000</b>	<b>0.2499</b>	<b>174.1926</b>	<b>0.0029</b>	<b>0.0027</b>
<b>CONSTRUCTION AND PRODUCTION TOTAL</b>	<b>5.5065</b>	<b>6.6104</b>	<b>0.0573</b>	<b>8.0201</b>	<b>1.2639</b>	<b>17.7425</b>	<b>0.0263</b>	<b>0.0505</b>	<b>0.0021</b>	<b>0.0014</b>	<b>0.0000</b>	<b>0.2508</b>	<b>953.4301</b>	<b>0.0399</b>	<b>0.0257</b>

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.

Table 5.22 Per Well Total 2011

EMISSION SUMMARY - 2011															
Emissions by Source Category (lbs/well)															
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Well Pad Construction															
General Activity	--	--	--	230.14	34.52	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2,808.48	280.85	--	--	--	--	--	--	--	--	--	--
Equipment Exhaust	104.85	342.65	33.76	33.76	1.19	28.49	0.17	0.13	0.06	0.04	--	--	23,506	1.13	0.70
Vehicle Exhaust	27.76	10.30	0.01	--	--	7.64	0.02	0.02	0.0065	0.0045	--	--	2,705	0.12	0.08
Subtotal	132.61	352.95	33.77	3,072.38	316.56	36.13	0.19	0.15	0.06	0.05	0.00	0.00	26,211.35	1.26	0.77
Well Construction															
Vehicle Road Dust	--	--	--	3.41	0.34	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	47.22	14.40	0.00	0.00	0.05	10.26	0.14	0.09	0.03	0.02	--	--	3,687	0.34	0.34
Drilling Engines - Tier 2	7,346.10	10,736.74	78.82	423.82	423.82	2,825.40	10.50	8.37	3.67	2.56	--	--	1,473,840	71.00	43.75
Drilling Engines - Tier 4a (2011)	7,346.19	1,412.73	78.82	211.91	211.91	847.64	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09	43.75
Drilling Engines - Tier 4b (2015)	7,346.19	1,412.73	78.82	62.16	62.16	395.50	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09	43.75
Subtotal (with Tier 4a drilling)	7,393.41	1,427.13	78.82	215.32	212.30	857.90	10.73	8.46	3.69	2.57	0.00	0.00	1,477,526.72	71.43	44.09
Completion and Testing															
Flaring	33.60	40.00	0	3.04	3.04	2.20	--	0.00	0.00	--	--	1.81	48,000	0.92	0.88
Waste Pond Evaporation	--	--	--	--	--	700.00	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	8,777.68	877.77	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	71.20	25.72	0.04	--	--	19.00	0.07	0.06	0.02	0.01	--	--	6,737	0.34	0.24
Frac Pump Engines	1,481.36	6,874.56	454.61	487.87	487.87	557.53	1.83	1.45	0.63	0.44	--	--	255,024	56.62	--
Subtotal	104.80	65.72	0.28	8,780.72	880.81	721.20	0.07	0.06	0.02	0.01	0.00	1.81	54,736.92	1.26	1.12
CONSTRUCTION TOTAL <sup>1</sup>	7,630.81	1,845.80	112.87	12,068.42	1,409.67	1,615.23	10.99	8.67	3.78	2.63	0.00	1.81	1,558,474.99	73.95	45.99
Well Production															
Heater/Treater	180.35	214.71	1.2882	16.3176	16.3176	11.8088	0.16	0.00	0.01	--	--	--	257,647	4.94	4.72
Condensate Tanks	--	--	--	--	--	31,860.00	--	91.80	--	--	--	499.50	--	--	--
Gas Generator	3,130.89	1,808.29	0.44	0.06	0.06	--	41.25	0.33	0.30	0.14	0.03	0.33	82,195	--	--
Wind Blown Dust	--	--	--	1,030.82	618.49	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2,712.74	271.27	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	70.86	28.00	0.03	--	--	20.14	0.22	0.17	0.05	0.03	--	--	8,543	0.90	0.65
Subtotal	3,382.09	2,051.00	1.76	3,759.94	906.14	31,891.95	41.62	92.31	0.36	0.17	0.03	499.83	348,385.18	5.84	5.38
PRODUCTION TOTAL	3,382.09	2,051.00	1.76	3,759.94	906.14	31,891.95	41.62	92.31	0.36	0.17	0.03	499.83	348,385.18	5.84	5.38
CONSTRUCTION AND PRODUCTION TOTAL	11,012.91	3,896.80	114.63	15,828.36	2,315.81	33,507.18	52.62	100.98	4.14	2.81	0.03	501.64	1,906,860.18	79.79	51.36

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.

Table 5.22 Per Well Total 2011, cont.

Emissions by Source Category (tons/well)															
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Well Pad Construction															
General Activity	--	--	--	0.1151	0.0173	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.4042	0.1404	--	--	--	--	--	--	--	--	--	--
Equipment Exhaust	0.0524	0.1713	0.0169	0.0169	0.0006	0.0142	0.0001	0.0001	0.0000	0.0000	--	--	11.7530	0.0006	0.0003
Vehicle Exhaust	0.0139	0.0051	0.0000	--	--	0.0038	0.0000	0.0000	0.0000	0.0000	--	--	1.3527	0.0001	0.0000
Subtotal	0.0663	0.1765	0.0169	1.5362	0.1583	0.0181	0.0001	0.0001	0.0000	0.0000	0.0000	0.0000	13.1057	0.0006	0.0004
Well Construction															
Vehicle Road Dust	--	--	--	0.0017	0.0002	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0236	0.0072	0.0000	0.0000	0.0000	0.0051	0.0001	0.0000	0.0000	0.0000	--	--	1.8434	0.0002	0.0002
Drilling Engines - Tier 2	3.6731	5.3684	0.0304	0.2110	0.2110	1.4127	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4a (2011)	3.6731	0.7064	0.0394	0.1060	0.1060	0.4238	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4b (2015)	3.6731	0.7064	0.0304	0.0311	0.0311	0.1978	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Subtotal (with Tier 4a drilling)	3.6967	0.7136	0.0354	0.1077	0.1062	0.4289	0.0054	0.0042	0.0018	0.0013	0.0000	0.0000	738.7634	0.0357	0.0220
Completion and Testing															
Flaring	0.0168	0.0200	0.0001	0.0015	0.0015	0.0011	--	0.0000	0.0000	--	--	0.0009	24.0000	0.0005	0.0004
Waste Pond Evaporation	--	--	--	--	--	0.3500	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	4.3888	0.4389	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0356	0.0129	0.0000	--	--	0.0095	0.0000	0.0000	0.0000	0.0000	--	--	3.3685	0.0002	0.0001
Frac Pump Engines	0.7407	3.4373	0.2273	0.2439	0.2439	0.2788	0.0009	0.0007	0.0003	0.0002	--	--	127.5120	0.0283	--
Subtotal	0.0524	0.0329	0.0001	4.3904	0.4404	0.3606	0.0000	0.0000	0.0000	0.0000	0.0000	0.0009	27.3685	0.0006	0.0006
CONSTRUCTION TOTAL <sup>1</sup>	3.8154	0.9229	0.0564	6.0342	0.7048	0.8076	0.0055	0.0043	0.0019	0.0013	0.0000	0.0009	779.2375	0.0370	0.0230
Well Production															
Heater/Treater	0.0902	0.1074	0.0006	0.0082	0.0082	0.0059	0.0001	0.0000	0.0000	--	--	--	128.8235	0.0025	0.0024
Condensate Tanks	--	--	--	--	--	15.9300	--	0.0459	--	--	--	0.2498	--	--	--
Gas Generator	1.5654	0.9041	0.0002	0.0000	0.0000	--	0.0206	0.0002	0.0002	0.0001	0.0000	0.0002	41.0975	--	--
Wind Blown Dust	--	--	--	0.5154	0.3092	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.3564	0.1356	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0354	0.0140	0.0000	--	--	0.0101	0.0001	0.0001	0.0000	0.0000	--	--	4.2715	0.0004	0.0003
Subtotal	1.6910	1.0255	0.0009	1.8800	0.4531	15.9460	0.0208	0.0462	0.0002	0.0001	0.0000	0.2499	174.1926	0.0029	0.0027
PRODUCTION TOTAL	1.6910	1.0255	0.0009	1.8800	0.4531	15.9460	0.0208	0.0462	0.0002	0.0001	0.0000	0.2499	174.1926	0.0029	0.0027
CONSTRUCTION AND PRODUCTION TOTAL	5.5065	1.9484	0.0573	7.9142	1.1579	16.7536	0.0263	0.0505	0.0021	0.0014	0.0000	0.2508	953.4301	0.0399	0.0257

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.

Table 5.23 Per Well Total 2028

EMISSION SUMMARY - 2028														
Emissions by Source Category (lbs/well)														
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>
Well Pad Construction														
General Activity	--	--	--	230.1	34.5	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2808.5	280.8	--	--	--	--	--	--	--	--	--
Equipment Exhaust	104.8	342.6	33.8	33.8	1.2	28.5	0.17	0.13	0.06	0.04	--	--	23,506	1.13
Vehicle Exhaust	27.8	10.3	0.0	--	--	7.6	0.02	0.02	0.0065	0.0045	--	--	2,705	0.12
Subtotal	132.61	352.95	33.77	3,072.38	316.56	36.13	0.19	0.15	0.06	0.05	0.00	0.00	26,211.35	1.26
Well Construction														
Vehicle Road Dust	--	--	--	3.4	0.3	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	47.2	14.4	0.0	0.0	0.1	10.3	0.14	0.09	0.03	0.02	--	--	3,687	0.34
Drilling Engines - Tier 2	7,346.2	10,736.7	78.8	423.8	423.8	2,825.5	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09
Drilling Engines - Tier 4a (2011)	7,346.2	1,412.7	78.8	211.9	211.9	847.6	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09
Drilling Engines - Tier 4b (2015)	7,346.2	1,412.7	78.8	62.2	62.2	395.6	10.59	8.37	3.67	2.56	--	--	1,473,840	71.09
Subtotal (with Tier 4b drilling)	7,393.41	1,427.13	78.82	65.57	62.56	405.82	10.73	8.46	3.69	2.57	0.00	0.00	1,477,526.72	71.43
Completion and Testing														
Flaring	33.6	40.0	0.2	3.0	3.0	2.2	--	0.00	0.00	--	--	1.81	48,000	0.92
Waste Pond Evaporation	--	--	--	--	--	700.0	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	8,777.7	877.8	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	71.2	25.7	0.0	--	--	19.0	0.07	0.06	0.02	0.01	--	--	6,737	0.34
Frac Pump Engines	1,481.4	6,874.6	454.6	487.9	487.9	557.5	1.83	1.45	0.63	0.44	--	--	255,024	56.62
Subtotal	1,586.16	6,940.28	454.88	9,268.59	1,368.68	1,278.72	1.91	1.50	0.66	0.46	0.00	1.81	309,760.92	57.89
CONSTRUCTION TOTAL <sup>1</sup>	9,112.17	8,720.36	567.48	12,406.54	1,747.79	1,720.68	12.82	10.12	4.42	3.08	0.00	1.81	1,813,496.99	130.57
Well Production														
Heater/Treater	180.4	214.7	1.3	16.3	16.3	11.8	0.16	0.00	0.01	--	--	--	257,647	4.94
Condensate Tanks	--	--	--	--	--	31,860.0	--	91.80	--	--	--	499.50	--	--
Gas Generator	3,130.9	1,808.3	0.4	0.1	0.1	--	41.25	0.33	0.30	0.14	0.03	0.33	82,195	--
Wind Blown Dust	--	--	--	1,030.8	618.5	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	2,712.7	271.3	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	70.9	28.0	0.0	--	--	20.1	0.22	0.17	0.05	0.03	--	--	8,543	0.90
Subtotal	3,382.09	2,051.00	1.76	3,759.94	906.14	31,891.95	41.62	92.31	0.36	0.17	0.03	499.83	348,385.18	5.84
PRODUCTION TOTAL	3,382.09	2,051.00	1.76	3,759.94	906.14	31,891.95	41.62	92.31	0.36	0.17	0.03	499.83	348,385.18	5.84
CONSTRUCTION AND PRODUCTION TOTAL	12,494.26	10,771.36	569.24	16,166.48	2,653.94	33,612.63	54.45	102.42	4.78	3.25	0.03	501.64	2,161,884.18	136.41

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.

Table 5.23 Per Well Total 2028, cont.

Emissions by Source Category (tons/well)															
Source Type	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOCs	Formaldehyde	Benzene	Toluene	Xylene	Ethylbenzene	Hexane	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Well Pad Construction															
General Activity	--	--	--	0.1151	0.0173	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.4042	0.1404	--	--	--	--	--	--	--	--	--	--
Equipment Exhaust	0.0524	0.1713	0.0169	0.0169	0.0006	0.0142	0.0001	0.0001	0.0000	0.0000	--	--	11.7530	0.0006	0.0003
Vehicle Exhaust	0.0139	0.0051	0.0000	--	--	0.0038	0.0000	0.0000	0.0000	0.0000	--	--	1.3527	0.0001	0.0000
Subtotal	0.0663	0.1765	0.0169	1.5362	0.1583	0.0181	0.0001	0.0001	0.0000	0.0000	0.0000	0.0000	13.1057	0.0006	0.0004
Well Construction															
Vehicle Road Dust	--	--	--	0.0017	0.0002	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0236	0.0072	0.0000	0.0000	0.0000	0.0051	0.0001	0.0000	0.0000	0.0000	--	--	1.8434	0.0002	0.0002
Drilling Engines - Tier 2	3.6731	5.3084	0.0304	0.2110	0.2110	1.4127	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4a (2011)	3.6731	0.7064	0.0304	0.1000	0.1000	0.4238	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Drilling Engines - Tier 4b (2015)	3.6731	0.7064	0.0304	0.0311	0.0311	0.1978	0.0053	0.0042	0.0018	0.0013	--	--	736.9200	0.0355	0.0219
Subtotal (with Tier 4b drilling)	3.6967	0.7136	0.0304	0.0328	0.0313	0.2029	0.0054	0.0042	0.0018	0.0013	0.0000	0.0000	738.7634	0.0357	0.0220
Completion and Testing															
Flaring	0.0168	0.0200	0.0001	0.0015	0.0015	0.0011	--	0.0000	0.0000	--	--	0.0009	24.0000	0.0005	0.0004
Waste Pond Evaporation	--	--	--	--	--	0.3500	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	4.3888	0.4389	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0356	0.0129	0.0000	--	--	0.0095	0.0000	0.0000	0.0000	0.0000	--	--	3.3685	0.0002	0.0001
Frac Pump Engines	0.7407	3.4373	0.2273	0.2439	0.2439	0.2788	0.0009	0.0007	0.0003	0.0002	--	--	127.5120	0.0283	--
Subtotal	0.7931	3.4701	0.2274	4.6343	0.6843	0.6354	0.0010	0.0008	0.0003	0.0002	0.0000	0.0009	154.8805	0.0289	0.0006
CONSTRUCTION TOTAL <sup>1</sup>	4.5561	4.3602	0.2837	6.2033	0.8739	0.8603	0.0064	0.0051	0.0022	0.0015	0.0000	0.0009	906.7495	0.0653	0.0230
Well Production															
Heater/Treater	0.0902	0.1074	0.0006	0.0082	0.0082	0.0059	0.0001	0.0000	0.0000	--	--	--	128.8235	0.0025	0.0024
Condensate Tanks	--	--	--	--	--	15.9300	--	0.0459	--	--	--	0.2498	--	--	--
Gas Generator	1.5654	0.9041	0.0002	0.0000	0.0000	--	0.0206	0.0002	0.0002	0.0001	0.0000	0.0002	41.0975	--	--
Wind Blown Dust	--	--	--	0.5154	0.3092	--	--	--	--	--	--	--	--	--	--
Vehicle Road Dust	--	--	--	1.3564	0.1356	--	--	--	--	--	--	--	--	--	--
Vehicle Exhaust	0.0354	0.0140	0.0000	--	--	0.0101	0.0001	0.0001	0.0000	0.0000	--	--	4.2715	0.0004	0.0003
Subtotal	1.6910	1.0255	0.0009	1.8800	0.4531	15.9460	0.0208	0.0462	0.0002	0.0001	0.0000	0.2499	174.1926	0.0029	0.0027
PRODUCTION TOTAL	1.6910	1.0255	0.0009	1.8800	0.4531	15.9460	0.0208	0.0462	0.0002	0.0001	0.0000	0.2499	174.1926	0.0029	0.0027
CONSTRUCTION AND PRODUCTION TOTAL	6.2471	5.3857	0.2846	8.0832	1.3270	16.8063	0.0272	0.0512	0.0024	0.0016	0.0000	0.2508	1080.9421	0.0682	0.0257

Notes:

<sup>1</sup>Construction emissions are based on a per well constructed/drilled basis. Construction emissions occur only in the year that a well pad is constructed and associated wells are drilled. All drilling is assumed to be completed in the year of well pad construction.



Table 5.24 Total by Year

ALTERNATIVE B - TOTAL EMISSIONS BY YEAR

Wells to be Drilled Annually

Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Wells Drilled Per Year	14	14	14	14	28	17	17	17	31	16	16	16	30	16	16	16	30	16	16	16
Total Producing Wells	14	28	42	56	84	101	118	135	166	182	198	214	244	260	276	292	322	338	354	370

Estimated Construction Emissions (tons/yr)

Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Tier 2 Drill Rig Engines (%)	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tier 4a Drill Rig Engines (%)	0%	0%	100%	100%	100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Tier 4b Drill Rig Engines (%)	0%	0%	0%	0%	0%	0%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
CO	53	53	53	53	107	65	77	77	141	73	73	73	137	73	73	73	137	73	73	73
NOx	78	78	13	13	26	16	74	74	135	70	70	70	131	70	70	70	131	70	70	70
SO2	1	1	1	1	2	1	5	5	9	5	5	5	9	5	5	5	9	5	5	5
PM10	86	86	84	84	169	103	105	105	192	99	99	99	186	99	99	99	186	99	99	99
PM2.5	11	11	10	10	20	12	15	15	27	14	14	14	26	14	14	14	26	14	14	14
VOC	25	25	11	11	23	14	15	15	27	14	14	14	26	14	14	14	26	14	14	14
Formaldehyde	0.08	0.08	0.08	0.08	0.15	0.09	0.11	0.11	0.20	0.10	0.10	0.10	0.19	0.10	0.10	0.10	0.19	0.10	0.10	0.10
Benzene	0.06	0.06	0.06	0.06	0.12	0.07	0.09	0.09	0.16	0.08	0.08	0.08	0.15	0.08	0.08	0.08	0.15	0.08	0.08	0.08
Toluene	0.03	0.03	0.03	0.03	0.05	0.03	0.04	0.04	0.07	0.04	0.04	0.04	0.07	0.04	0.04	0.04	0.07	0.04	0.04	0.04
Xylene	0.02	0.02	0.02	0.02	0.04	0.02	0.03	0.03	0.05	0.02	0.02	0.02	0.05	0.02	0.02	0.02	0.05	0.02	0.02	0.02
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hexane	0.01	0.01	0.01	0.01	0.03	0.02	0.02	0.02	0.03	0.01	0.01	0.01	0.03	0.01	0.01	0.01	0.03	0.01	0.01	0.01
Total HAPs	0.20	0.20	0.20	0.20	0.39	0.24	0.27	0.27	0.50	0.26	0.26	0.26	0.48	0.26	0.26	0.26	0.48	0.26	0.26	0.26
CO2	10,909	10,909	10,909	10,909	21,819	13,247	15,415	15,415	28,109	14,508	14,508	14,508	27,202	14,508	14,508	14,508	27,202	14,508	14,508	14,508
CH4	1	1	1	1	1	1	1	1	2	1	1	1	2	1	1	1	2	1	1	1
N2O	0.32	0.32	0.32	0.32	0.64	0.39	0.39	0.39	0.71	0.37	0.37	0.37	0.69	0.37	0.37	0.37	0.69	0.37	0.37	0.37

Table 5.24 Total by Year, cont.

Estimated Production Emissions (tons/yr)

Year	1 2009	2 2010	3 2011	4 2012	5 2013	6 2014	7 2015	8 2016	9 2017	10 2018	11 2019	12 2020	13 2021	14 2022	15 2023	16 2024	17 2025	18 2026	19 2027	20 2028
CO	24	47	71	95	142	171	200	228	281	308	335	362	413	440	467	494	545	572	599	626
NOx	14	29	43	57	86	104	121	138	170	187	203	219	250	267	283	299	330	347	363	379
SO <sub>2</sub>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PM <sub>10</sub>	26	53	79	105	158	190	222	254	312	342	372	402	459	489	519	549	605	635	666	696
PM <sub>2.5</sub>	6	13	19	25	38	46	53	61	75	82	90	97	111	118	125	132	146	153	160	168
VOC	223	446	670	893	1,339	1,611	1,882	2,153	2,647	2,902	3,157	3,412	3,891	4,146	4,401	4,656	5,135	5,390	5,645	5,900
Formaldehyde	0.29	0.58	0.87	1.17	1.75	2.10	2.46	2.81	3.45	3.79	4.12	4.45	5.08	5.41	5.74	6.08	6.70	7.03	7.37	7.70
Benzene	0.65	1.29	1.94	2.58	3.88	4.66	5.45	6.23	7.66	8.40	9.14	9.88	11.26	12.00	12.74	13.48	14.86	15.60	16.34	17.08
Toluene	0.00	0.01	0.01	0.01	0.02	0.02	0.02	0.02	0.03	0.03	0.04	0.04	0.04	0.05	0.05	0.05	0.06	0.06	0.06	0.07
Xylene	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.03	0.03	0.03	0.03	0.03
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01
Hexane	3.50	7.00	10.50	14.00	20.99	25.24	29.49	33.74	41.49	45.48	49.48	53.48	60.98	64.98	68.98	72.98	80.47	84.47	88.47	92.47
Total HAPs	4.44	8.88	13.32	17.76	26.64	32.03	37.43	42.82	52.65	57.72	62.80	67.87	77.39	82.46	87.54	92.61	102.13	107.20	112.28	117.35
CO <sub>2</sub>	2,439	4,877	7,316	9,755	14,632	17,593	20,555	23,516	28,916	31,703	34,490	37,277	42,503	45,290	48,077	50,864	56,090	58,877	61,664	64,451
CH <sub>4</sub>	0.04	0.08	0.12	0.16	0.25	0.29	0.34	0.39	0.48	0.53	0.58	0.62	0.71	0.76	0.81	0.85	0.94	0.99	1.03	1.08
N <sub>2</sub> O	0.04	0.08	0.11	0.15	0.23	0.27	0.32	0.36	0.45	0.49	0.53	0.58	0.66	0.70	0.74	0.78	0.87	0.91	0.95	0.99

Estimated Total Emissions (tons/yr)

Year	1 2009	2 2010	3 2011	4 2012	5 2013	6 2014	7 2015	8 2016	9 2017	10 2018	11 2019	12 2020	13 2021	14 2022	15 2023	16 2024	17 2025	18 2026	19 2027	20 2028
CO	77	101	124	148	249	236	277	306	422	381	408	435	549	513	540	567	681	644	672	699
NOx	93	107	56	70	112	119	195	213	305	256	273	289	381	336	353	369	461	416	433	449
SO <sub>2</sub>	1	1	1	1	2	1	5	5	9	5	5	5	9	5	5	5	9	5	5	5
PM <sub>10</sub>	112	139	163	190	327	292	327	359	504	441	471	502	645	588	618	648	791	735	765	795
PM <sub>2.5</sub>	18	24	29	35	58	58	68	76	102	96	104	111	137	132	139	146	172	167	174	182
VOC	248	472	681	904	1,362	1,624	1,896	2,167	2,674	2,916	3,171	3,426	3,917	4,160	4,415	4,670	5,160	5,404	5,659	5,914
Formaldehyde	0.37	0.66	0.95	1.24	1.90	2.20	2.56	2.92	3.65	3.89	4.22	4.56	5.27	5.51	5.85	6.18	6.89	7.14	7.47	7.80
Benzene	0.71	1.35	2.00	2.65	4.00	4.74	5.53	6.32	7.82	8.48	9.22	9.96	11.41	12.08	12.82	13.56	15.01	15.68	16.42	17.16
Toluene	0.03	0.03	0.03	0.04	0.07	0.05	0.06	0.06	0.10	0.07	0.07	0.07	0.11	0.08	0.09	0.09	0.12	0.10	0.10	0.10
Xylene	0.02	0.02	0.02	0.02	0.04	0.03	0.04	0.04	0.06	0.04	0.04	0.04	0.07	0.05	0.05	0.05	0.07	0.05	0.05	0.06
Ethylbenzene	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01
Hexane	3.51	7.01	10.51	14.01	21.02	25.26	29.51	33.75	41.51	45.50	49.50	53.50	61.01	64.99	68.99	72.99	80.50	84.49	88.48	92.48
Total HAPs	4.64	9.08	13.52	17.96	27.03	32.27	37.70	43.09	53.15	57.98	63.06	68.13	77.67	82.72	87.79	92.87	102.61	107.46	112.53	117.61
CO <sub>2</sub>	13,348	15,787	18,225	20,664	36,451	30,840	35,969	38,931	57,025	46,211	48,998	51,785	69,705	59,796	62,585	65,372	83,292	73,365	76,172	78,959
CH <sub>4</sub>	0.56	0.60	0.64	0.68	1.28	0.92	1.45	1.50	2.51	1.58	1.62	1.67	2.67	1.80	1.85	1.90	2.90	2.03	2.08	2.12
N <sub>2</sub> O	0.36	0.40	0.43	0.47	0.87	0.66	0.71	0.75	1.16	0.86	0.90	0.94	1.35	1.07	1.11	1.15	1.56	1.28	1.32	1.36



